

Exhibit 32

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024

1-4

<p>Page 1</p> <p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE DISTRICT OF MINNESOTA 3 ----- 4 SMARTMATIC USA CORP., SMARTMATIC INTERNATIONAL 5 HOLDING B.V., AND SGO CORPORATION LIMITED, Case No. 6 22-cv-0098-JMB-JFD Plaintiffs, 7 v. 8 MICHAEL J. LINDELL and 9 MY PILLOW, INC., 10 Defendants. 11 ----- 12 13 VIDEOTAPED DEPOSITION 14 OF 15 DARREN M. LINDELL 16 JUNE 18, 2024 17 18 19 20 21 22 23 24 Job No. J11362632 25 Stenographically Reported By: Amy L. Larson, RRP</p>	<p>Page 3</p> <p>1 APPEARANCES: 2 BENESCH, FRIEDLANDER, COPLAN & ARONOFF, LLP Attorneys for Plaintiffs 3 71 South Wacker Drive Suite 1600 4 Chicago, IL 60606 BY: TIMOTHY FREY, ESQ. 5 tfrey@beneschlaw.com JULIE LOFTUS, ESQ. 6 jloftus@beneschlaw.com 7 MCSWEENEY, CYNKAR & KACHOUROFF, PLLC Attorneys for Defendants 8 13649 Office Place Suite 101 9 Woodbridge, Virginia 22192 BY: CHRISTOPHER KACHOUROFF, ESQ. 10 chris@mck-lawyers.com 11 12 ALSO PRESENT: 13 Robert Buchman, Videographer 14 15 16 17 18 19 20 21 22 23 24 25</p>
<p>Page 2</p> <p>1 2 3 4 Videotaped Deposition of DARREN M. LINDELL, taken 5 before Amy L. Larson, a Registered Professional 6 Reporter, Notary Public in the State of Minnesota and 7 State of Wisconsin, Certified Court Reporter in 8 the states of Washington, Utah and New Mexico, and 9 Certified Shorthand Reporter in the states of 10 Oregon and Illinois, taken on June 18, 2024, at 11 the law offices of Robins Kaplan, 800 LaSalle 12 Avenue, Suite 2800, Minneapolis, Minnesota, 13 commencing at approximately 9:24 a.m. 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>Page 4</p> <p>1 INDEX: 2 EXAMINATION BY: PAGE 3 Mr. Frey 8 4 PREVIOUSLY-MARKED EXHIBITS: 5 Exhibit No. 6 Exhibit 92 23 MyPillow Corporate Bylaws Bates DEF030754-000001 - DEF030754-000019 7 8 Exhibit 93 33 9 What are the Odds? From Crack Addict to CEO 10 Mike Lindell Bates DEF043826.000001 - 11 DEF043826.000413 12 Exhibit 98 89 September 22, 2021 Email 13 Bates DEF122127.000001 - DEF122127.000005, DEF122128.000001, DEF122129.000001, 14 DEF122130.000001 15 Exhibit 641 111 Text Messages 16 Bates DEF082645.000001 - DEF082645.000004, DEF082645.000034 - DEF082645.000037, 17 DEF082645.000047 18 EXHIBITS MARKED FOR IDENTIFICATION: 19 Exhibit No. 20 Exhibit 659 47 Page Vault 21 Document Title: Trump March Bus Tour 22 No Bates 23 Exhibit 660 69 Photographs 24 Bates SMARTMATIC-LINDELL00000006, SMARTMATIC-LINDELL000000031, 25 SMARTMATIC-LINDELL000000020</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024

5-8

<p>Page 5</p> <p>1 INDEX: (Cont'd.)</p> <p>2 EXHIBITS REFERENCED: PAGE</p> <p>3 Exhibit No.</p> <p>4 Exhibit 661 74</p> <p>5 Page Vault</p> <p>6 Document Title: FrankSpeech.com</p> <p>7 No Bates</p> <p>8 Exhibit 662 80</p> <p>9 September 8, 2022 Email</p> <p>10 Bates DEF026737.000001 -</p> <p>11 DEF026737.000003</p> <p>12 Exhibit 663 83</p> <p>13 November 2021 Email Chain</p> <p>14 Bates DEF061612.000001 -</p> <p>15 DEF061612.000003, DEF061613.000001</p> <p>16 - DEF061613.000002</p> <p>17 Exhibit 664 100</p> <p>18 MyPillow Board Meeting 10/31/2022</p> <p>19 Agenda</p> <p>20 Bates DEF10333719 - DEF10333721</p> <p>21 Exhibit 665 105</p> <p>22 Text Messages</p> <p>23 Bates DEF049098.000001 -</p> <p>24 DEF049098.000187</p> <p>25 Exhibit 666 119</p> <p>MyPillow Board Meeting 10.5.2021</p> <p>Agenda</p> <p>Bates DEF11273862 - DEF11273864</p> <p>Exhibit 669 51</p> <p>Video Clip</p> <p>Absolute Proof Documentary</p> <p>Exhibit 670 53</p> <p>Video Clip</p> <p>Steve Bannon - War Room</p> <p>Exhibit 671 61</p> <p>Video Clip</p> <p>Pete Santilli Show</p>	<p>Page 7</p> <p>1 P R O C E E D I N G S</p> <p>2</p> <p>3 THE VIDEOGRAPHER: We are on the</p> <p>4 record. This is the videotaped deposition of</p> <p>5 Darren M. Lindell taken on June 18th, 2024.</p> <p>6 The time is now approximately 9:24 a.m.</p> <p>7 The deposition is being taken in the</p> <p>8 matter of Smartmatic USA Corp., et al. vs.</p> <p>9 Michael J. Lindell, et al., filed in the</p> <p>10 United States District Court for the District</p> <p>11 of Minnesota, case number 22-cv-0098-JMB-JFD.</p> <p>12 The deposition is taking place in</p> <p>13 Minneapolis, Minnesota. My name is Robert</p> <p>14 Buchman. I am the videographer representing</p> <p>15 Esquire Deposition Solutions.</p> <p>16 Will counsel please identify</p> <p>17 themselves for the record.</p> <p>18 MR. FREY: This is Tim Frey on</p> <p>19 behalf of the plaintiffs.</p> <p>20 MS. LOFTUS: Julie Loftus, also on</p> <p>21 behalf of the plaintiffs.</p> <p>22 MR. KACHOUROFF: Chris Kachouroff</p> <p>23 on behalf of MyPillow, Inc., and Michael</p> <p>24 Lindell.</p> <p>25 THE VIDEOGRAPHER: Will the court</p>
<p>Page 6</p> <p>1 INDEX: (Cont'd.)</p> <p>2</p> <p>3 *** REPORTER'S NOTE:</p> <p>4 Exhibits 667-668 marked in James Furlong</p> <p>5 Deposition taken 6/19/24</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>Page 8</p> <p>1 reporter please swear in the witness.</p> <p>2</p> <p>3 DARREN M. LINDELL,</p> <p>4 a witness in the above-entitled action,</p> <p>5 after having been first duly sworn, was</p> <p>6 deposed and says as follows:</p> <p>7</p> <p>8 EXAMINATION</p> <p>9 BY MR. FREY:</p> <p>10 Q. Good morning, Mr. Lindell.</p> <p>11 A. Good morning.</p> <p>12 Q. We met briefly this morning, but my name is</p> <p>13 Tim Frey. I'm counsel for the plaintiffs in</p> <p>14 this action. I'll be asking you some</p> <p>15 questions today, okay?</p> <p>16 A. Yep.</p> <p>17 Q. Before this morning, you and I had never met,</p> <p>18 right?</p> <p>19 A. Correct.</p> <p>20 Q. Could you please state and spell your name</p> <p>21 for the record.</p> <p>22 A. Darren Lindell. D-A-R-R-E-N, L-I-N-D-E-L-L.</p> <p>23 Q. And where do you live, Mr. Lindell?</p> <p>24 A. Chaska, Minnesota.</p> <p>25 Q. What is your address?</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024

9-12

<p style="text-align: right;">Page 9</p> <p>1 A. 4448 Savannah Trail Drive -- or Savannah 2 Trail, no Drive -- Chaska, Minnesota 55318. 3 Q. Thank you. 4 Have you been deposed before today? 5 A. No, I have not. 6 Q. Okay. So your counsel may have already 7 explained some of the rules and protocols for 8 depositions to you, but I'm just going to go 9 over a couple for the record. 10 First, I'll ask that you allow me to 11 finish asking the question before you answer. 12 Does that make sense? 13 A. Yes. 14 Q. Okay. And, likewise, I will do my best to 15 let you finish answering the question before 16 I ask another one, okay? 17 A. Yep. 18 Q. All your answers need to be verbal. It's a 19 little bit awkward, I know, but we have the 20 court reporter here who is taking down 21 everything said. So the natural inclination 22 can be just to nod your head or shake head, 23 but we need yeses or noes. 24 A. Gotcha. 25 Q. During my questioning today, your counsel</p>	<p style="text-align: right;">Page 11</p> <p>1 A. That I'm going to a deposition, that I have 2 it today, I'm on the way -- 3 Q. Okay. 4 A. -- that type of thing. He called me this 5 morning, but it wasn't really about this. 6 Q. Okay. Did you speak at all about his 7 deposition that occurred last week? 8 A. No. 9 Q. And I understand that Jessica Maskovich has 10 also been deposed in this case; is that 11 correct? 12 A. Yes. 13 Q. And what is your relationship with -- 14 A. Fiancee. 15 Q. And what did you discuss -- not the conflict, 16 I don't need to know the subject matter, but 17 have you discussed the substance of your 18 deposition testimony with Ms. Maskovich? 19 A. No. 20 Q. Okay. I just want to talk first about your 21 relationship with MyPillow. 22 A. Okay. 23 Q. When did you first start working for 24 MyPillow? 25 A. Well, it's kind of difficult, because I grew</p>
<p style="text-align: right;">Page 10</p> <p>1 might object to a question. Unless counsel 2 instructs you not to answer, you still need 3 to answer the question even after the 4 objection. 5 Do you understand that? 6 A. Yes. 7 Q. And if you need a break at any time, just let 8 me know, we can take breaks. The only 9 request that I make there is that we don't do 10 it while a question is pending. So if I've 11 asked a question, you know, let's answer it 12 and then we can take a break. 13 Fair? 14 A. Yep. 15 Q. Okay. Do you know of any reason that would 16 provide you -- or prevent you from providing 17 accurate testimony today? 18 A. No. 19 Q. Mr. Lindell, did you meet with anyone to 20 prepare for your deposition today? 21 A. No. 22 Q. Did you speak with Mike Lindell at all about 23 your deposition today? 24 A. Briefly. 25 Q. What did you guys discuss?</p>	<p style="text-align: right;">Page 12</p> <p>1 up -- he built the company, I was working 2 there as his son. Officially, in more of an 3 official role, would be 19 years ago about, 4 so... 5 Q. Okay. 6 A. I don't know the exact date. 7 Q. Do you recall -- 8 A. I was 23, I think, so not 19 years ago, maybe 9 11 years ago. 10 Q. Do you recall what your first position was, 11 your first official position? 12 A. Yeah, if we're going off when I left my other 13 job and came to MyPillow, just like a 14 full-time employee, I was just in the 15 shipping department. 16 Q. Okay. And then I'm assuming that you 17 advanced from that position, the shipping 18 department? 19 A. Correct. 20 Q. What was your next position with MyPillow? 21 A. I can't really think of the title, but 22 shipping manager would have been sort of -- 23 from going from working in the shipping 24 department to running the shipping 25 department.</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024
13-16

<p style="text-align: right;">Page 13</p> <p>1 Q. Okay. And what were your responsibilities 2 when you were managing the shipping 3 department? 4 A. Making sure the orders get out for the day to 5 the customers, making sure employees are 6 clocked in, clocked out, you know, just 7 running the department. 8 Q. Okay. And after you were the shipping 9 manager, did you have another promotion? 10 A. Yeah, VP of operations. 11 Q. Okay. And do you recall when -- about when 12 you became VP of operations? 13 A. I want to say five years ago would be a good 14 estimate. 15 Q. And how did your responsibilities change when 16 you became the VP of operations? 17 A. Started doing things outside of the shipping 18 department. Still operations, like -- but 19 returns department, maybe call center, that 20 type of thing. 21 Q. And did you report directly to anyone when 22 you were the VP of operations? 23 A. Yeah, to Mike. 24 Q. Okay. And did you oversee, directly oversee 25 employees?</p>	<p style="text-align: right;">Page 15</p> <p>1 Q. And what were -- or what are your 2 responsibilities as -- 3 A. Very similar to -- 4 Q. -- COO? 5 A. -- VP of operations. I mean, the job really 6 didn't change. Our COO left. I guess it was 7 more of a title thing. I don't know. You 8 know, so very similar responsibilities. I 9 still oversee the shipping department, the, 10 you know, customer service, returns, that 11 type of thing. 12 Q. Okay. So as COO, do you continue to report 13 to Mike Lindell? 14 A. Correct. 15 Q. Do you also report to the board? 16 A. I'm on the board. 17 Q. Okay. 18 A. So when we do board meetings, you know, 19 things are discussed and whatnot, but... 20 Q. And when did you get appointed to the board? 21 A. These dates are tough. I don't -- eight 22 years ago. I don't know. Years ago. 23 Q. So while you were -- while you were VP of 24 operations -- 25 A. Yeah, yeah.</p>
<p style="text-align: right;">Page 14</p> <p>1 A. Yes. 2 Q. About how many employees would you say? 3 A. That directed -- 4 Q. Direct reports to you. 5 A. Direct reports to me, probably like eight. 6 But, obviously, below them is a ton of hourly 7 workers that are working in each department 8 so... 9 Q. Okay. 10 A. So if you include all those, a couple 11 hundred, I mean... 12 Q. Okay. And then at some point in time, were 13 you promoted to chief operating officer? 14 A. Yeah. 15 Q. Okay. When did that occur? 16 A. I want to say three years ago. 17 Q. So 20 -- 18 A. These dates could be -- I mean, it's a few 19 years ago. I don't know exactly the time, 20 but yeah. 21 Q. Do you recall if it was before or after the 22 November 2020 election? 23 A. 2020 election? I want to say before. 24 Q. Okay. 25 A. I could be wrong.</p>	<p style="text-align: right;">Page 16</p> <p>1 Q. Okay. 2 A. And possibly before that. 3 Q. Okay. And as a board member, what -- what 4 are your duties and responsibilities? 5 A. I just show up and vote on things. If 6 there's votes, he -- each person will give a 7 recap of sort of their portion of the company 8 and sit and listen and give input. 9 Q. So is the board, I guess, mainly made up of 10 kind of operational folks who then also sit 11 on the board? 12 A. No. It's changed over the years, but there's 13 people that don't even work at the company, 14 there's people that I don't really know or 15 Mike knows. 16 But there are -- you know, our 17 lawyer. We used to have an in-house lawyer. 18 Well, we still have someone there, but I 19 don't know if they're on the board. But our 20 COO before me was on it. I mean, it's a mix 21 of -- mix of different people. 22 Q. And who was the COO before you? 23 A. Kim Rasmussen. 24 Q. And so as the COO, then, you said you kind of 25 oversee -- oversee shipping, right?</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024
17-20

<p style="text-align: right;">Page 17</p> <p>1 A. Yeah.</p> <p>2 Q. I know there's various things. So one of</p> <p>3 them is, like, overseeing the shipping</p> <p>4 department?</p> <p>5 A. Yeah, you know, who -- the guy who runs</p> <p>6 shipping reports to me.</p> <p>7 Q. Okay.</p> <p>8 A. I'll make sure things are going smoothly,</p> <p>9 orders are getting. But same thing with the</p> <p>10 returns department, the call center, the</p> <p>11 customer service department. You know, I</p> <p>12 work with purchasing, stuff like that.</p> <p>13 Q. Okay. Do you have any responsibilities with</p> <p>14 respect to marketing?</p> <p>15 A. Not much. I maybe have input on our</p> <p>16 commercials some. I do some input on mailers</p> <p>17 that we mail the customers.</p> <p>18 Q. And when you say, "Commercials," are those TV</p> <p>19 ads or --</p> <p>20 A. TV ads, yeah.</p> <p>21 Q. Any other kind of commercials?</p> <p>22 A. No.</p> <p>23 Q. And then mailers. So explain to me what the</p> <p>24 mailer is.</p> <p>25 A. It's a postcard you'd get in the mail, which</p>	<p style="text-align: right;">Page 19</p> <p>1 errors on it type of thing. They might ask</p> <p>2 my opinion in how it looks, but I'm not the</p> <p>3 deciding factor on that.</p> <p>4 Q. Who is the who who makes the decisions on</p> <p>5 those type of --</p> <p>6 A. In the end, Mike is going to make the final</p> <p>7 decision. But Jessica, my fiancée, is more</p> <p>8 of the design person.</p> <p>9 And then we have a couple people that</p> <p>10 actually do the design in Photoshop or</p> <p>11 whatever, you know, we tell them what to do</p> <p>12 and they create it.</p> <p>13 Q. So like graphic design?</p> <p>14 A. Yeah, like graphic design team so...</p> <p>15 Q. Okay. But Mike Lindell will make the final</p> <p>16 decision on kind of what --</p> <p>17 A. Yeah, we wouldn't send a mailer out without</p> <p>18 his final approval.</p> <p>19 Q. Okay. And who comes up for the ideas for</p> <p>20 the -- for the mailers?</p> <p>21 A. Mostly Mike, I would say. He'll bounce ideas</p> <p>22 around as far as offers and stuff with me and</p> <p>23 Jess. Mostly just me and Jess.</p> <p>24 Q. Okay. Do you own shares of MyPillow stock?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 18</p> <p>1 would have a MyPillow offer on it. We mail</p> <p>2 them out to, you know, either previous</p> <p>3 customers, you know, just a way to reach out</p> <p>4 to customers, but it would just be an ad for</p> <p>5 MyPillows --</p> <p>6 Q. Okay.</p> <p>7 A. -- whatever special we're running, so...</p> <p>8 Q. Are there any instances where you would</p> <p>9 put -- I don't know if it would be called a</p> <p>10 mailer, but like an item inside of a pillow</p> <p>11 shipment that you're sending out, like --</p> <p>12 A. Yeah, we have a brochure that we put in</p> <p>13 there.</p> <p>14 Q. It's a brochure? Okay.</p> <p>15 And does that also fall under your --</p> <p>16 A. I work on those, yeah.</p> <p>17 Q. Okay. And then what -- what kind of work do</p> <p>18 you -- when you say, like, you have input on</p> <p>19 the mailers and the brochures, is that</p> <p>20 design, is that substance, is that logistics?</p> <p>21 A. Less design. I'm not a design person. But</p> <p>22 the offers themselves, making sure that the</p> <p>23 offers match what we have on the website,</p> <p>24 making sure the 800 number works, the promo</p> <p>25 code works, everything is -- there's no</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. Do you recall when you became a shareholder</p> <p>2 in MyPillow?</p> <p>3 A. The first shares I got were very -- I mean,</p> <p>4 maybe I was 18. We did an infomercial in --</p> <p>5 around -- around the infomercial time, which</p> <p>6 is like, yeah, 15 years ago, maybe.</p> <p>7 Q. Okay. And how many shares of MyPillow stock</p> <p>8 do you own?</p> <p>9 A. I actually don't know.</p> <p>10 Q. Okay. Do you know how many shareholders</p> <p>11 MyPillow has?</p> <p>12 A. No, not an exact number.</p> <p>13 Q. Okay. Do you know if there are shareholder</p> <p>14 meetings?</p> <p>15 A. There have been.</p> <p>16 Q. About approximately how many shareholder</p> <p>17 meetings do you recall?</p> <p>18 A. Five, maybe. That's a pretty big guess.</p> <p>19 Q. What -- what are the circumstances in which</p> <p>20 there will be a shareholder meeting?</p> <p>21 A. I'm not sure. We'll just get a -- I'll get a</p> <p>22 thing saying, hey, we're having a shareholder</p> <p>23 meeting, similar to -- yeah, I don't know</p> <p>24 what brings them about.</p> <p>25 Q. Okay. Do you recall, like, what's been</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024
21-24

<p style="text-align: right;">Page 21</p> <p>1 discussed at the shareholder meetings?</p> <p>2 A. Not really. It's been a while.</p> <p>3 Q. Okay. I was going to say, do you recall the</p> <p>4 most recent shareholder meeting?</p> <p>5 A. It's been, I don't know, quite a few years,</p> <p>6 so I'm not sure.</p> <p>7 Q. Has there been any shareholder meetings since</p> <p>8 the 2020 election?</p> <p>9 A. Not that I'm aware of.</p> <p>10 Q. And you also said you're a member of the</p> <p>11 MyPillow board of directors --</p> <p>12 A. Yeah.</p> <p>13 Q. -- correct?</p> <p>14 And you think you joined that</p> <p>15 approximately eight years ago?</p> <p>16 A. Yeah. Again, that's -- I -- that's</p> <p>17 approximate.</p> <p>18 Q. Okay. And how -- how that -- how did your</p> <p>19 membership on the board come about?</p> <p>20 A. I think probably around when I was promoted</p> <p>21 to VP of operations, sort of a -- and they</p> <p>22 just vote on it, I guess, and...</p> <p>23 Q. Okay. Do you remember -- we talked briefly</p> <p>24 about who else was on the board -- is on the</p> <p>25 board.</p>	<p style="text-align: right;">Page 23</p> <p>1 A. Yes. Not everyone. Sometimes there's --</p> <p>2 I've done a few over the phone, but mostly in</p> <p>3 person.</p> <p>4 Q. Mostly in person? Okay.</p> <p>5 And are votes taken at board</p> <p>6 meetings?</p> <p>7 A. Yep.</p> <p>8 Q. And what types of issues does the board vote</p> <p>9 on?</p> <p>10 A. A lot of the votes are people leaving the</p> <p>11 board and coming on the board.</p> <p>12 What other issues did we vote on? I</p> <p>13 can't recall what we voted on.</p> <p>14 Q. Do you -- do you recall the board voting on</p> <p>15 anything other than board -- board members</p> <p>16 leaving or resigning?</p> <p>17 A. I'm sure there was. Recalling exactly what</p> <p>18 we voted on, no, I don't know.</p> <p>19 Q. Okay. So I want to look at an exhibit that</p> <p>20 was previously marked as Exhibit 92.</p> <p>21 MR. FREY: And, Chris, Julie is</p> <p>22 going to send this to you.</p> <p>23 BY MR. FREY:</p> <p>24 Q. But it's previously marked as Exhibit 92,</p> <p>25 Bates-labeled DEF030754.</p>
<p style="text-align: right;">Page 22</p> <p>1 Do you recall who was on the board at</p> <p>2 the time you joined?</p> <p>3 A. I mean, do you want me to name people? I</p> <p>4 recall a handful of them.</p> <p>5 Q. Okay. Who do you recall?</p> <p>6 A. Mike's on the board, Jessica was on the</p> <p>7 board, Kim was on the board, our counsel at</p> <p>8 the time was on the board. Two or three</p> <p>9 people that I didn't know, but they're</p> <p>10 outside of MyPillow.</p> <p>11 I think that's -- there might have</p> <p>12 been a few others that I can't recall.</p> <p>13 Q. Okay. Between the time you joined the board</p> <p>14 and the present, is there a regular cadence</p> <p>15 to board meetings? Meaning, is it, like, are</p> <p>16 there quarterly meetings, are there, you</p> <p>17 know, biannual meetings? How long --</p> <p>18 A. At least once a year.</p> <p>19 Q. Okay. And have you -- has the board met once</p> <p>20 a year at least for the last four years?</p> <p>21 A. They haven't met this year. I'm trying to --</p> <p>22 I can't recall if we met last year. But</p> <p>23 before that, yeah, I believe we have.</p> <p>24 Q. Okay. And when the board meets, do you meet</p> <p>25 in person?</p>	<p style="text-align: right;">Page 24</p> <p>1 And I'll represent to you,</p> <p>2 Mr. Lindell, that this is a copy of the</p> <p>3 MyPillow corporate bylaws that were produced</p> <p>4 to us in this litigation.</p> <p>5 A. Okay.</p> <p>6 Q. And if we look at page 4 of this document,</p> <p>7 under Article 3, do you see it says, "Title,</p> <p>8 board of directors," and then 3.01 is,</p> <p>9 "Duties"?</p> <p>10 A. Yep.</p> <p>11 Q. Okay. Do you see the first duty there in</p> <p>12 3.01(a) is that the board has -- or, I'm</p> <p>13 sorry, not even to (a), just 3.01.</p> <p>14 Do you see it says, "The board of</p> <p>15 directors shall manage the business and</p> <p>16 affairs of the corporation"?</p> <p>17 A. Yep.</p> <p>18 Q. And so as a board member, do you agree that</p> <p>19 the MyPillow board of directors has the</p> <p>20 authority to manage the business and affairs</p> <p>21 of MyPillow, Inc.?</p> <p>22 A. Yeah.</p> <p>23 Q. And looking down at 3.01(a) --</p> <p>24 THE COURT REPORTER: I'm sorry,</p> <p>25 Chris, I saw your mouth moving --</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024
25-28

<p style="text-align: right;">Page 25</p> <p>1 MR. KACHOUROFF: I was just 2 getting ready to unmute it. I don't have the 3 exhibit. Can you just email them to me 4 en masse and that way I don't have to wait 5 for them? 6 MR. FREY: Yeah, why don't we 7 take -- why don't we go off the record really 8 quick. 9 THE VIDEOGRAPHER: We're going off 10 the record. The time now is 9:42 a.m. 11 (Recess.) 12 THE VIDEOGRAPHER: We are going 13 back on the record. The time now is 14 9:48 a.m. 15 BY MR. FREY: 16 Q. Okay. Mr. Lindell, we're back on the record. 17 Sorry about that, just a logistical issue. 18 A. Yep. 19 Q. Have you had the time now to look over this, 20 what was previously marked as Exhibit 92, the 21 bylaws for MyPillow? 22 A. Yeah, a bit. 23 Q. And do you -- do you recognize this document? 24 A. No. 25 Q. Have you seen this document before?</p>	<p style="text-align: right;">Page 27</p> <p>1 Do you see that? 2 A. Where are you at? 3 Q. 3.01(b). 4 A. Yep, yep. 5 Q. Do you see that? 6 A. Yep. 7 Q. Okay. Do you recall any instances in which 8 the board has decided to enter into a 9 contract on behalf of MyPillow? 10 A. No, I don't recall anything. 11 Q. Do you recall any instances in which the 12 board has ever decided to enter into 13 advertising arrangements or contracts on 14 behalf of MyPillow? 15 A. I don't recall the board ever doing that, no. 16 Q. And so fair to say you don't recall the board 17 ever voting on whether to enter into an 18 advertising contract on behalf of MyPillow? 19 A. No, I don't recall that. 20 Q. When the board does meet, who -- who calls 21 the board meetings? 22 A. Who officially calls them? I'm not sure. 23 I'm not sure how they're set. 24 Q. Okay. How are you made aware of when -- 25 A. I get an email --</p>
<p style="text-align: right;">Page 26</p> <p>1 A. No. 2 Q. Do you see -- we were looking at the duties 3 of the board on page 4 under Article 3. 4 A. Yep. 5 Q. And do you see there in 3.01(a) it states 6 that, "The board has the power to borrow 7 money for the corporation"? 8 A. Yep. 9 Q. How does the board decide whether MyPillow 10 should borrow money? 11 A. I don't know. 12 Q. Do you recall any instances in which the 13 board discussed -- 14 A. Not that I remember, no. 15 Q. Do you recall any instances in which the 16 board voted on whether or not MyPillow should 17 borrow money? 18 A. MyPillow should borrow money from -- 19 Q. Any -- 20 A. Oh, no, not that I recall. No. 21 Q. Okay. If you go down to 3.01(b), you'll see 22 that it states, "The board has the duty and 23 power to enter into contracts necessary or 24 appropriate for the conduct of affairs of the 25 corporation."</p>	<p style="text-align: right;">Page 28</p> <p>1 Q. Okay. 2 A. -- board meeting, you know, just a calendar 3 invite. 4 Q. Okay. Who does that invite usually come 5 from? 6 A. Usually legal. So I think currently that's 7 Doug Wardlow. 8 Q. Okay. And when you get the invite for the 9 meeting, is there an agenda provided? 10 A. We get a hard copy when we get there. I 11 don't know if it's in the email. It might 12 be. 13 Q. Okay. But you do receive an agenda when 14 you -- 15 A. Yep. 16 Q. -- arrive for the board meeting? 17 And are those also prepared by legal? 18 A. I believe so, yeah. 19 Q. And when the board meets, who -- who leads 20 the board meetings? 21 A. Legal, and then it's sort of just tossed 22 around to each person who needs to speak, who 23 is on the agenda, and then Mike will do his 24 thing. 25 Q. Okay. When you say, "Mike will do his</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024

29-32

<p style="text-align: right;">Page 29</p> <p>1 thing," could you expand? What do you mean</p> <p>2 by that?</p> <p>3 A. He's just going to go over what's going on in</p> <p>4 the company and what -- he's -- he knows the</p> <p>5 most. You know, we're all in our corners</p> <p>6 doing our things, and he's going to give more</p> <p>7 of a bird's-eye view what's -- what's going</p> <p>8 on.</p> <p>9 Q. Have you ever presented at a board meeting?</p> <p>10 A. Presented?</p> <p>11 Q. Like --</p> <p>12 A. Yeah, I mean, I've had to share how things</p> <p>13 are going in certain departments or where we</p> <p>14 could do things better or, you know, stuff</p> <p>15 like that.</p> <p>16 Q. Okay. Is that typically related to kind of</p> <p>17 operational --</p> <p>18 A. It's all operational-based. So, yeah, if</p> <p>19 it's, you know, post-holidays, I actually</p> <p>20 have a, hey, here's what was tough during the</p> <p>21 holiday season, here's how we could get</p> <p>22 better, that type of thing.</p> <p>23 Q. And do you report on the financial aspects of</p> <p>24 how the company is doing?</p> <p>25 A. Me? No.</p>	<p style="text-align: right;">Page 31</p> <p>1 Q. And are you aware of whether anyone takes</p> <p>2 minutes of the board meetings?</p> <p>3 A. Yes, we do take minutes.</p> <p>4 Q. Who is responsible for that?</p> <p>5 A. Again, it was Jennifer Pauly. She also no</p> <p>6 longer works for us. So at the next board</p> <p>7 meeting, there will be someone else taking</p> <p>8 minutes.</p> <p>9 Q. But previously it was Jennifer Pauly?</p> <p>10 A. Yes.</p> <p>11 Q. And what was her position?</p> <p>12 A. At MyPillow, she was the head of IT. And I</p> <p>13 don't know if she always did it. There might</p> <p>14 have been other people who did it, but that's</p> <p>15 who I remember recently.</p> <p>16 Q. Okay. And is -- are those minutes then</p> <p>17 circulated to the board members after the</p> <p>18 meeting?</p> <p>19 A. Correct.</p> <p>20 Q. And how do those get circulated?</p> <p>21 A. Email, I believe.</p> <p>22 Q. And at the board meetings, I know we talked</p> <p>23 about this a little bit, but does the board</p> <p>24 have a formal decision-making process?</p> <p>25 A. As far as, yeah, just votes, yea or nay.</p>
<p style="text-align: right;">Page 30</p> <p>1 Q. Okay. Who is responsible for that?</p> <p>2 A. Who is that now? It was Kim Rasmussen, and</p> <p>3 then Mark Schabert, and then -- I mean, as of</p> <p>4 right now, we just -- I don't know who would</p> <p>5 be doing it right now, as far as on the board</p> <p>6 because, Mark Schabert isn't working for us</p> <p>7 so...</p> <p>8 Q. And who is Mark Schabert?</p> <p>9 A. He was our controller for a period of time.</p> <p>10 Q. Okay. And is it fair to say that now the</p> <p>11 person who is responsible for that isn't</p> <p>12 on -- isn't a board member? Or are you</p> <p>13 just -- you're not aware of who that person</p> <p>14 is?</p> <p>15 A. I'm not aware of who would be filling that</p> <p>16 role --</p> <p>17 Q. Okay.</p> <p>18 A. -- on the board at least. I don't know -- I</p> <p>19 don't know if they're -- I don't know what</p> <p>20 the plan is for that.</p> <p>21 Q. Okay.</p> <p>22 A. Mark left, so...</p> <p>23 Q. And when did Mark leave?</p> <p>24 A. A year ago maybe. Maybe a little longer, a</p> <p>25 year and a half.</p>	<p style="text-align: right;">Page 32</p> <p>1 Q. And just describe for me how that works.</p> <p>2 Will someone, like, introduce a resolution</p> <p>3 and then you go around and vote on it, or</p> <p>4 what's the process?</p> <p>5 A. Someone will, you know, discuss, we'll get to</p> <p>6 a point where someone then -- I forget what</p> <p>7 the phrase is. They sort of throw out the</p> <p>8 question. And then everyone says yea. And</p> <p>9 if anyone says nay, then, I guess, then you</p> <p>10 do a -- figure out the majority or whatnot.</p> <p>11 But we -- it's all sort of at the same time.</p> <p>12 Q. Okay. Do you recall any instances in which</p> <p>13 there was a nay vote?</p> <p>14 A. I do not recall any, no.</p> <p>15 Q. And so then if the votes are all yea, then</p> <p>16 the proposed action will be adopted and --</p> <p>17 A. Yeah, whoever did it will -- maybe it's</p> <p>18 like -- I'm pretty sure there's an, "I second</p> <p>19 that," type thing goes on, too, so -- but</p> <p>20 then, yeah, it's implemented, I guess.</p> <p>21 Q. And who -- who is the person who typically</p> <p>22 introduces the resolutions?</p> <p>23 A. Usually it was legal.</p> <p>24 Q. Okay. Have you ever voted nay on any</p> <p>25 proposed action?</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024

33-36

<p style="text-align: right;">Page 33</p> <p>1 A. I do not recall ever voting nay, no. 2 Q. Okay. I want to look briefly at -- 3 MR. FREY: Did we send this to 4 Chris? 5 MS. LOFTUS: Yes. 6 BY MR. FREY: 7 Q. This is a document that was previously marked 8 as Exhibit 93. 9 A. Do you want 92 back? 10 Q. You can set it to the side. 11 A. Okay. 12 Q. And you'll see that this is a printed copy of 13 Mike Lindell's book. 14 A. Yes. 15 Q. Do you recognize this? What Are The Odds? -- 16 A. I do. 17 Q. -- From Drug Addict to CEO? 18 And you can feel free to flip through 19 it and make sure it's accurate, but I want to 20 just look at a certain section of it. 21 A. Okay. 22 Q. I'm not going to quiz you on the whole thing. 23 But if you could turn to page 367. 24 And you'll see in the bottom right-hand 25 corner there's little Bates numbers.</p>	<p style="text-align: right;">Page 35</p> <p>1 know, he's going to go all in to help him get 2 elected. 3 Do you see that? 4 A. Yes. 5 Q. Okay. And were you present at this board 6 meeting? 7 A. I believe I was, yes. 8 Q. And do you recall the discussion around 9 Mike Lindell's decision to go all in to help 10 President Trump get elected? 11 A. Yeah, I vaguely remember it, this -- reading 12 this. 13 Q. Okay. And at the bottom of the page, he 14 writes that his attorney strongly advised him 15 at the board meeting against going public, 16 because it would cost MyPillow dearly. 17 Do you see that? 18 A. Yep. 19 Q. And do you recall that interaction? 20 A. No. I mean, I don't recall the -- I don't 21 doubt it happened. I would -- but I don't -- 22 I don't remember it exactly, how it went 23 down, but, yeah. 24 Q. Okay. Do you recall if anyone else at the 25 board meeting expressed concerns?</p>
<p style="text-align: right;">Page 34</p> <p>1 A. Oh, okay. Gotcha. So the last three digits 2 there? 3 Q. Yeah, the last three digits, 367. 4 MR. KACHOUROFF: Which exhibit are 5 we on? 6 MR. FREY: We are on what was 7 previously marked as Exhibit 93, Chris. 8 MR. KACHOUROFF: Got it. Okay. 9 MR. FREY: And we're looking at 10 page 367, which is the beginning of 11 Chapter 43 of the book. 12 BY MR. FREY: 13 Q. You can take your time, read just the first 14 page there. And let me know when you're 15 ready. 16 A. (Reviews document.) Just these ones? 17 Q. Yeah. 18 A. Yeah, I get the gist. 19 Q. Okay. All right. Do you see here 20 Mike Lindell is discussing kind of his first 21 meeting with former President Trump and then 22 returning to a MyPillow board meeting? 23 A. Yep. 24 Q. Okay. And Mike Lindell says that he came 25 back to the board and reported that, you</p>	<p style="text-align: right;">Page 36</p> <p>1 A. No, I don't recall that. 2 Q. And did the board -- do you recall if the 3 board then continued to discuss whether 4 Mike Lindell should -- should go all in and 5 support the candidate -- then-candidate Trump 6 for president? 7 A. No, I don't -- I don't recall the details of 8 the discussion or how long it was or anything 9 like that. 10 Q. Do you recall if the board took any vote on 11 the issue related to Mr. Mike Lindell 12 supporting then-candidate Trump for 13 president? 14 A. I don't recall a vote. 15 Q. Do you recall if the board considered any 16 propositions or resolutions related to the 17 Trump campaign? 18 A. Not that I recall. 19 Q. Okay. Do you recall if any board member 20 introduced any resolutions about the 2016 21 election or who to support? 22 A. Not that I recall, no. 23 Q. You can set the book aside -- 24 A. Oh, okay. 25 Q. -- we're done with it for now.</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024

37-40

<p style="text-align: right;">Page 37</p> <p>1 Has the board of MyPillow ever 2 discussed distancing MyPillow from 3 Mike Lindell's political activities? 4 A. Not that I recall. 5 Q. Has the board ever voted on distancing 6 MyPillow from Mike Lindell's political 7 activities? 8 A. Not that I recall. 9 Q. And you testified earlier that the board does 10 vote on certain issues, right? 11 A. Yes. 12 Q. Does -- do board members discuss with one 13 another prior to a vote how they're intending 14 to vote? 15 A. Not that I recall. I've never. I mean, a 16 lot of things we don't know what we're going 17 to be voting on, so... 18 Q. Does -- does Mike Lindell ever tell other 19 board members how he intends to vote on a 20 particular issue before the vote is called? 21 A. Not that I've recalled, no. 22 Q. Do you recall any instances in which 23 Mike Lindell voted one way on an issue, but 24 was overruled by the board? 25 A. Not that I recall.</p>	<p style="text-align: right;">Page 39</p> <p>1 A. Specific instances, no. 2 THE COURT REPORTER: I'm sorry, 3 Chris, did you object there? 4 MR. KACHOUROFF: I did. Just 5 objection to form. Sorry about that. 6 BY MR. FREY: 7 Q. You don't recall any specific instances. 8 Do you recall generally any 9 instances? 10 A. I mean, that we've decided to do something 11 that he at first didn't want to do? I'm sure 12 there's lots of those. 13 Q. Or vice versa. 14 A. An official vote, I don't recall anything 15 like that. 16 Q. And can you give me any examples of any of 17 what those instances would have been? 18 A. I mean, it could as little as pricing of a 19 product. It could be, you know, buying a 20 machine. I don't know. Anything like that. 21 Q. How about in the area of marketing, do you 22 recall any instances in which MyPillow, via 23 the board, disagreed with a marketing 24 strategy that Mike Lindell had? 25 A. I don't recall any.</p>
<p style="text-align: right;">Page 38</p> <p>1 Q. So for the most part, is it fair to say that 2 kind of the direction that Mike Lindell wants 3 to go is the direction that the board will 4 follow? 5 MR. KACHOUROFF: I'm going to 6 object to the question. Whether it's fair to 7 say is not even relevant. 8 BY MR. FREY: 9 Q. You can answer. 10 A. Gotcha. I don't think that's the case 11 always, you know. I think he is the runner 12 of the company, I mean, he -- so usually his 13 vision is what we want to do. But I don't 14 think anyone is afraid to say, you know, 15 let's not do that. 16 I mean, as you saw, the corporate 17 attorney spoke up in that instance, so... 18 Q. Do you recall any other instances where 19 someone has spoken up and disagreed? 20 A. Not specific instances, but we don't always 21 agree, so... 22 Q. And when there's disagreement, do you recall 23 any instances where the opposite direction of 24 the direction Mike Lindell wants to go is the 25 direction that the company goes?</p>	<p style="text-align: right;">Page 40</p> <p>1 Q. And by "marketing," I mean advertisements and 2 promotions and that kind of thing. 3 A. Yeah, yeah. 4 Q. Just to make sure that you understood what I 5 meant by marketing. 6 A. Like TV ads or radio ads, that kind of stuff. 7 No, I don't recall anything with the board 8 doing anything like that, no. 9 Q. This is an odd question, but just for the 10 record, how do you know Mike Lindell? 11 A. I'm his son. 12 Q. Okay. And not getting into your familial 13 relationship, but I want to talk about your 14 business relationship -- 15 A. Yep. 16 Q. -- with Mike Lindell as the COO and board 17 member of MyPillow. 18 How often do you discuss business 19 issues with Mike Lindell? 20 A. Often. 21 Q. Daily? 22 A. Daily, yes. 23 Q. Okay. And how do you most often communicate? 24 A. I'd say phone call. 25 Q. Okay. Do you also text?</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024

41-44

<p style="text-align: right;">Page 41</p> <p>1 A. Yep.</p> <p>2 Q. Do you ever email?</p> <p>3 A. Occasionally. It's less than text.</p> <p>4 Q. Okay. And do you use any other chat</p> <p>5 functionalities, like a WhatsApp or Signal or</p> <p>6 any of those --</p> <p>7 A. No.</p> <p>8 Q. -- to communicate with Mike Lindell?</p> <p>9 A. Not with Mike, no.</p> <p>10 Q. And when -- you know, you said you</p> <p>11 communicate with him almost daily.</p> <p>12 What types of issues are you</p> <p>13 discussing?</p> <p>14 A. Operation issues. So, you know, when product</p> <p>15 is getting in, when we're getting stuff on</p> <p>16 the website, how -- is shipping behind, do we</p> <p>17 need to move labor around. All sorts of just</p> <p>18 operational discussions is mostly what it is.</p> <p>19 Q. Okay. And does -- does Mike Lindell seek</p> <p>20 your advice regarding the business operations</p> <p>21 of MyPillow?</p> <p>22 A. Yeah, I think he values my opinion, I guess.</p> <p>23 Q. And -- and those issues are the kind of</p> <p>24 issues we just talked about, so like shipping</p> <p>25 or the laborers and --</p>	<p style="text-align: right;">Page 43</p> <p>1 Q. Okay. And when -- when he discusses with you</p> <p>2 his -- his opinions or his views on the 2020</p> <p>3 election, what does he tell you?</p> <p>4 A. It could be lots of things. What does he</p> <p>5 tell me? That he -- what -- do you have a</p> <p>6 more specific question?</p> <p>7 Q. Sure. I mean, does he -- have you ever</p> <p>8 discussed Smartmatic and its role in the 2020</p> <p>9 election with Mike Lindell?</p> <p>10 A. Smartmatic? He doesn't like machines,</p> <p>11 speaking about Smartmatic and Dominion.</p> <p>12 Q. So he discusses with you just negative --</p> <p>13 A. It's like -- you know, it's not like he's</p> <p>14 coming to me and saying, hey, let's talk</p> <p>15 about Smartmatic. It's just maybe like --</p> <p>16 I'm not even sure if we talk about it versus</p> <p>17 I just see him on something yelling about</p> <p>18 them or something --</p> <p>19 Q. Okay.</p> <p>20 A. -- so...</p> <p>21 Q. Okay. Switching gears just a little bit?</p> <p>22 For right now, I want to talk about</p> <p>23 Lindell Management.</p> <p>24 A. Okay.</p> <p>25 Q. Are you familiar with an entity called</p>
<p style="text-align: right;">Page 42</p> <p>1 A. Customer service.</p> <p>2 Q. -- customer service?</p> <p>3 A. Yeah, yeah.</p> <p>4 Q. Okay. Does Mike Lindell ever seek your</p> <p>5 advice regarding the marketing of MyPillow?</p> <p>6 A. Again, maybe he'll send me a commercial and</p> <p>7 say, "What do you think?" The mailer, like I</p> <p>8 spoke on, I do work with that a bit, so that</p> <p>9 one would be one.</p> <p>10 Outside of that, not much, no.</p> <p>11 Q. Does Mike Lindell ever seek your advice</p> <p>12 regarding his theories on election fraud?</p> <p>13 A. My advice? No.</p> <p>14 Q. Does he ever seek your opinion?</p> <p>15 A. Not really, no, not my opinion.</p> <p>16 Q. Do you ever discuss the 2020 election with</p> <p>17 Mike Lindell?</p> <p>18 A. He might discuss it in a conversation, but I</p> <p>19 don't -- it's not a lot of back-and-forth</p> <p>20 between the two of us on election stuff.</p> <p>21 Q. Okay. So is it fair to say that you haven't</p> <p>22 really -- you don't really provide him with</p> <p>23 your opinions about it?</p> <p>24 A. Yeah, I don't bring him my opinions on</p> <p>25 politics and stuff.</p>	<p style="text-align: right;">Page 44</p> <p>1 Lindell Management?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. And what is Lindell Management?</p> <p>4 A. It's a -- I might describe it wrong. I don't</p> <p>5 know. It's a group of employees that work</p> <p>6 for Mike, I would guess, and do things for</p> <p>7 him.</p> <p>8 Q. Okay. Have you ever been employed by</p> <p>9 Lindell Management?</p> <p>10 A. No.</p> <p>11 Q. Have you ever worked on any projects for</p> <p>12 Lindell Management?</p> <p>13 A. Not that I recall, no.</p> <p>14 Q. Fair to say you've never received</p> <p>15 compensation from Lindell Management?</p> <p>16 A. I don't recall any, no.</p> <p>17 Q. Do you know who the officers of</p> <p>18 Lindell Management are?</p> <p>19 A. No. I -- I think Sarah Cronin is one, but I</p> <p>20 could be wrong. She's chief of staff. Is</p> <p>21 that an officer? I don't know.</p> <p>22 There might be a bunch that don't</p> <p>23 even work in Minnesota, so I have no idea who</p> <p>24 works at Lindell Management.</p> <p>25 Q. And do you have an understanding of the</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024

45-48

<p style="text-align: right;">Page 45</p> <p>1 purpose of Lindell Management?</p> <p>2 A. No. I don't -- it's a Mike thing. I don't</p> <p>3 work there, so I don't know.</p> <p>4 Q. Okay. And in your work for MyPillow,</p> <p>5 have you ever needed to work with</p> <p>6 Lindell Management?</p> <p>7 A. There are people there that work at</p> <p>8 Lindell Management. Have we done something</p> <p>9 together? I don't recall anything. I feel</p> <p>10 like maybe, but I don't --</p> <p>11 Q. Who are the people at MyPillow who work for</p> <p>12 Lindell Management?</p> <p>13 A. Sarah Cronin does, Cindy Taylor, I believe,</p> <p>14 and Katelyn Gamlin.</p> <p>15 Q. And what is Cindy Taylor's job at MyPillow?</p> <p>16 A. She doesn't work at MyPillow. She works at</p> <p>17 Lindell Management.</p> <p>18 Q. Oh, I'm sorry. I misunderstood. I thought</p> <p>19 you were saying there were people at MyPillow</p> <p>20 who also worked at --</p> <p>21 A. Oh, no. Not that I'm aware of, no. You're</p> <p>22 either in one or the other, you're not</p> <p>23 working at both.</p> <p>24 Q. Okay. So going back to discussions about the</p> <p>25 2020 election, are you aware that immediately</p>	<p style="text-align: right;">Page 47</p> <p>1 rallies?</p> <p>2 A. Yes.</p> <p>3 Q. Are you aware he attended the March for Trump</p> <p>4 bus tour?</p> <p>5 A. I wouldn't know that that -- specifically</p> <p>6 that he toured or he went with that event.</p> <p>7 Q. Okay.</p> <p>8 A. I don't know what that is.</p> <p>9 Q. So I'm going to show you a new document here.</p> <p>10 MR. FREY: Chris, this is Tab 24.</p> <p>11 And this will be Exhibit 659, I believe.</p> <p>12 (Exhibit 659 marked.)</p> <p>13 BY MR. FREY:</p> <p>14 Q. You can see here this first page of</p> <p>15 Exhibit 659 is what's called Page Vault, so</p> <p>16 it's a way to archive web pages.</p> <p>17 A. Okay.</p> <p>18 Q. And so you'll see here that the captured URL</p> <p>19 was the trumpmarch.com website.</p> <p>20 A. Okay.</p> <p>21 Q. Okay?</p> <p>22 A. Yep.</p> <p>23 Q. And do you see on the first page there's an</p> <p>24 image of the -- it says, "March for Trump bus</p> <p>25 tour," and then there's a picture of a bus;</p>
<p style="text-align: right;">Page 46</p> <p>1 following the 2020 presidential election,</p> <p>2 Mike Lindell started making public</p> <p>3 appearances in which he stated the 2020</p> <p>4 election was rigged and that Donald Trump was</p> <p>5 the rightful winner?</p> <p>6 A. Yes.</p> <p>7 Q. Did Mike Lindell discuss with you at that</p> <p>8 time his views about what had happened in the</p> <p>9 2020 election?</p> <p>10 A. Me directly, I don't recall that</p> <p>11 specifically, but I know his views.</p> <p>12 Q. And how do you know his views?</p> <p>13 A. He's pretty open with his views.</p> <p>14 Q. Just from --</p> <p>15 A. Yeah, just from -- I mean, he's -- yeah, I</p> <p>16 don't know, he -- like you said, he talks</p> <p>17 about it.</p> <p>18 Q. Okay. So you're aware that following the</p> <p>19 2020 election, Mike Lindell appeared on</p> <p>20 podcasts sharing his views about what had</p> <p>21 occurred?</p> <p>22 A. Podcasts, I don't know. I mean, I don't</p> <p>23 recall him being specifically on any</p> <p>24 podcasts.</p> <p>25 Q. Okay. Are you aware that he attended</p>	<p style="text-align: right;">Page 48</p> <p>1 do you see that?</p> <p>2 A. Yeah.</p> <p>3 Q. And do you see that right below the</p> <p>4 driver's-side window there's a MyPillow --</p> <p>5 A. Yep.</p> <p>6 Q. -- spot?</p> <p>7 Were you aware that there was a</p> <p>8 MyPillow advertisement placed on the</p> <p>9 March for Trump bus?</p> <p>10 A. No, I wasn't. I don't -- again, what they do</p> <p>11 in the advertising is sort of not something</p> <p>12 I'm focused on, so... I mean...</p> <p>13 Q. So you weren't aware, at the time that this</p> <p>14 was happening, that the MyPillow ad was on</p> <p>15 the bus?</p> <p>16 A. No.</p> <p>17 Q. Did -- do you recall any board discussions</p> <p>18 about the MyPillow logo being placed on</p> <p>19 the -- on the bus?</p> <p>20 A. No. No.</p> <p>21 Q. Do you know who made the decision to place</p> <p>22 the MyPillow logo on the March for Trump bus?</p> <p>23 A. I wouldn't know.</p> <p>24 Q. No?</p> <p>25 A. No, I wasn't involved in it, so I don't know</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024

49-52

<p style="text-align: right;">Page 49</p> <p>1 who did it.</p> <p>2 Q. Okay. And if you -- if you weren't involved,</p> <p>3 and it's fair to say that you wouldn't have</p> <p>4 taken any action as the COO of MyPillow in</p> <p>5 response to the logo being placed there?</p> <p>6 A. No. I mean, it's a logo on a bus. Is that</p> <p>7 bad? We sponsor lots of things, I assume.</p> <p>8 Q. I'm sorry?</p> <p>9 A. We sponsor a lot of different advertising,</p> <p>10 so...</p> <p>11 Q. And who --</p> <p>12 A. It wouldn't -- like if I was, Oh, why is</p> <p>13 there a logo, I wouldn't have -- it wouldn't</p> <p>14 have raised an alarm bell with me.</p> <p>15 Q. Okay. And you're not aware of it raising</p> <p>16 alarm bells with anyone else on the board?</p> <p>17 A. No. I'm not aware of that, no.</p> <p>18 Q. Okay. Are you aware that beginning in</p> <p>19 February of 2021, Mike Lindell published a</p> <p>20 series of documentaries related to the</p> <p>21 outcome of the 2020 presidential election and</p> <p>22 the role of voting machines?</p> <p>23 A. I'm aware of those, yes.</p> <p>24 Q. Were you involved at all in the publication</p> <p>25 of those documentaries?</p>	<p style="text-align: right;">Page 51</p> <p>1 back on the record. The time now is</p> <p>2 10:17 a.m.</p> <p>3 BY MR. FREY:</p> <p>4 Q. Okay. So, Mr. Lindell, we've cued up a clip</p> <p>5 of a snippet from the Absolute Proof</p> <p>6 documentary.</p> <p>7 MR. FREY: For the court reporter,</p> <p>8 this was previously marked as an exhibit at</p> <p>9 the deposition of Mike Lindell. We will get</p> <p>10 you the number that it was.</p> <p>11 So my colleague Julie will play that</p> <p>12 now.</p> <p>13 (Exhibit 669 marked.)</p> <p>14 (Video playing.)</p> <p>15 MIKE LINDELL: "Hello everyone,</p> <p>16 this is Mike Lindell, the CEO of MyPillow.</p> <p>17 As you all know, I have been attacked the</p> <p>18 last month relentlessly on social media, by</p> <p>19 newspapers, by TV shows, by -- you name it,</p> <p>20 I've been attacked."</p> <p>21 (Video stopped.)</p> <p>22 BY MR. FREY:</p> <p>23 Q. And you said you haven't seen that before?</p> <p>24 A. I've maybe seen clips of it, but I haven't</p> <p>25 watched the whole documentary.</p>
<p style="text-align: right;">Page 50</p> <p>1 A. No.</p> <p>2 Q. Did you know Mike Lindell was going to</p> <p>3 publish those before he did so?</p> <p>4 A. I don't recall knowing before. Yeah, I don't</p> <p>5 recall knowing then, in advance or anything</p> <p>6 like that, no.</p> <p>7 Q. Did the -- did -- were there any board</p> <p>8 meetings or discussions around the</p> <p>9 documentary series?</p> <p>10 A. His documentaries? No.</p> <p>11 Q. So the -- the first documentary was called</p> <p>12 Absolute Proof.</p> <p>13 Do you recall that?</p> <p>14 A. I've heard of it, yeah.</p> <p>15 Q. Okay. And have you watched Absolute Proof?</p> <p>16 A. No.</p> <p>17 Q. So we're going to play a short clip from the</p> <p>18 beginning of the Absolute Proof documentary.</p> <p>19 We'll go off the record really quick and set</p> <p>20 it up.</p> <p>21 A. Okay.</p> <p>22 THE VIDEOGRAPHER: We are going</p> <p>23 off the record. The time now is 10:16 a.m.</p> <p>24 (Recess.)</p> <p>25 THE VIDEOGRAPHER: We are going</p>	<p style="text-align: right;">Page 52</p> <p>1 Q. Okay. And you see there that at the start of</p> <p>2 the Absolute Proof documentary, Mike Lindell</p> <p>3 introduces himself as the CEO of MyPillow?</p> <p>4 A. Yeah.</p> <p>5 Q. And are you aware or familiar with the</p> <p>6 content of that documentary?</p> <p>7 A. Generally, yeah.</p> <p>8 Q. Are you aware that he and his guests claim</p> <p>9 that the election, the 2020 election, was</p> <p>10 rigged, in that documentary?</p> <p>11 A. I mean, I haven't watched it, but if you</p> <p>12 watched it and that's what you're saying,</p> <p>13 then sure.</p> <p>14 Q. Are you aware that Mr. Lindell, or</p> <p>15 Mike Lindell, and his guests also say or</p> <p>16 claim that the Smartmatic Core was what was</p> <p>17 used to rig the 2020 election?</p> <p>18 A. Again, I'm not aware of that myself. I</p> <p>19 didn't -- I didn't watch it, so...</p> <p>20 Q. Okay. And, again, as a -- as a MyPillow</p> <p>21 board member, did you ever have any</p> <p>22 discussions with other MyPillow board members</p> <p>23 regarding the content and publication of the</p> <p>24 Absolute Proof documentary?</p> <p>25 A. Not that I'm aware of, no.</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024

53-56

<p style="text-align: right;">Page 53</p> <p>1 Q. Are you aware that Mike Lindell also appeared 2 on different shows to promote his documentary 3 Absolute Proof? 4 A. I wasn't aware of that, but it would make 5 sense. 6 Q. Okay. So I want to show you one, and I'll 7 represent to you that Mike Lindell appeared 8 on Steve Bannon's podcast, War Room, on 9 February 6th, 2021, so the day after the 10 documentary was released. 11 A. Okay. 12 Q. I'm just going to play you a bit of that now. 13 And this was previously marked as an exhibit. 14 (Exhibit 670 marked.) 15 (Video playing.) 16 STEVE BANNON: "Okay, we're 17 honored to have as our guest America's number 18 one honey badger. That would be 19 Mike Lindell, CEO of MyPillow, also 20 MyCompany, and I think to his heart, most 21 importantly, the Lindell Recovery Center, 22 which is a biblically-based, Christian-based 23 recovery center" -- 24 THE COURT REPORTER: I'm sorry, 25 Julie, I can't hear it. If you want it taken</p>	<p style="text-align: right;">Page 55</p> <p>1 sorted. 2 "This is another thing I talk about, 3 this great wound of November 3rd, this has to 4 get sorted. And now Mike Lindell has offered 5 up to do it live on global media, whatever 6 that global media is, BBC, Guardian, all of 7 them, getting a room and he will go through 8 frame by frame his film with his backup -- 9 with his evidence and other backup evidence 10 and have the -- the guys challenge that, or 11 eventually I guess he's going to sue you. 12 "Mike, just one thing on your 13 business and the Recovery Network, I mean, 14 they've tried to put you out of business, the 15 big boxes, et cetera. Since you released 16 this atomic -- information atomic weapon 17 on -- on Friday, and it's been refuted by 18 the -- and, you know, all your -- all your -- 19 all your opponents and guys in the media have 20 been -- this has been met with derision, 21 right? 22 "They're saying it's all wrong, it's 23 all fiction, he's got a bunch of nut cases up 24 there on TV with him. A New York Times 25 columnist refers to it as Mike Lindell's</p>
<p style="text-align: right;">Page 54</p> <p>1 down for the record, we need to start over 2 and play it louder, because I can't hear it. 3 MS. LOFTUS: It doesn't -- I don't 4 think it goes any louder. 5 THE COURT REPORTER: Okay. Will 6 you be providing it to me so I can transcribe 7 it from what you've provided? 8 MS. LOFTUS: That's fine. 9 THE COURT REPORTER: Okay. 10 MR. FREY: Yes, yes. 11 THE COURT REPORTER: Okay. Thank 12 you. 13 (Video playing.) 14 STEVEN BANNON: -- "for people 15 that are -- have issues with drugs and 16 alcohol. 17 "I want also to reiterate to 18 Dominion, we've reached out to them, any 19 time, any place, we would love to have them 20 come on the show either with Mike Lindell or 21 just by themselves to counter what Mike 22 Lindell is putting out. 23 "Any -- any spokesmen for them or any 24 executives, we would love to have you guys on 25 here, because this -- this has got to get</p>	<p style="text-align: right;">Page 56</p> <p>1 fever dream. 2 "So have -- has any other pressure 3 come on your business since this launch 4 yesterday at 10:00 a.m. on One America News? 5 Have you had any additional pressure, big-box 6 suppliers, vendors, ad agencies? What has 7 happened with your business or the 8 Recovery Network since you launched this?" 9 MIKE LINDELL: "Well, the -- the -- 10 we've had -- we've had churches that actually 11 were going to come onboard the Lindell 12 Recovery Network, but there -- there has 13 been, all of the sudden they don't answer our 14 calls. But that's -- you know, they're just 15 afraid of cancel culture. 16 "And my employees know -- I want to 17 tell you this, all my employees have just 18 stepped it up, and one of them even said, 19 Mike, why don't you -- you're going on a show 20 today, use promo code Proof. 21 "So if you want, any -- any of the 22 listeners out there, if you want to use promo 23 code Proof, save up to 66 percent off of 24 stuff at mypillow.com. 25 "My employees, we're up to 27 -- over</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024

57-60

<p style="text-align: right;">Page 57</p> <p>1 2,700 now, we're getting busier, but they 2 keep canceling out and you're" -- 3 (Video stopped.) 4 BY MR. FREY: 5 Q. Do you recognize that as Mike Lindell on -- 6 A. Yeah. 7 Q. And did you hear there at the -- at the end 8 of that clip, Mike Lindell introduced a promo 9 code that could be used? 10 A. Yeah. 11 Q. And can you explain to me what the promo 12 codes are? 13 A. Promo codes are used to get a discount price 14 on our website. 15 Q. Okay. And so, essentially, a promo code then 16 is helping sales of MyPillow products? 17 A. It's helping the customer get a better price, 18 so I mean... 19 Q. It's a promotional -- 20 A. Yeah, yeah, it's a promo code. 21 Q. And who develops the -- the promo codes? 22 A. Who develops them? 23 Q. Or who comes up with the various promo codes 24 that are used by MyPillow? 25 A. Well, it depends what avenue the</p>	<p style="text-align: right;">Page 59</p> <p>1 Q. Well, matching them up, like so -- like 2 using -- placing the promo code on that 3 podcast and making it -- targeting it to 4 persons who are viewing this documentary. 5 A. Oh. 6 MR. KACHOUROFF: Objection to 7 form. 8 You can answer if you know. 9 THE WITNESS: I don't -- yeah, I 10 don't know. 11 What was the question again? 12 BY MR. FREY: 13 Q. Whether you agree with -- with using that -- 14 A. Agree with using the word "proof"? 15 Q. -- using a promo code -- 16 A. I don't -- I don't think it really mattered 17 what the code was. He gives a code on Bannon 18 every day, I believe, so... 19 It's just so you can track where the 20 sales are coming from, so... 21 Q. I'm not -- I'm not talking about the word 22 that was used for the code. 23 A. Yeah. 24 Q. But more that the -- that the code was -- was 25 tied to the promotion of the documentary</p>
<p style="text-align: right;">Page 58</p> <p>1 advertisement is in. I mean, there's radio 2 codes, there's TV codes, there's Google 3 analytic codes, there's Facebook codes. 4 So we have thousands of different 5 promo codes out there, just to track where 6 sales are coming from. 7 Q. Do you know who would have come up with this 8 promo code proof that was aired on -- 9 A. I'm not aware of who came up with that. 10 Q. -- War Room with Steve Bannon? 11 I'm sorry? 12 A. I'm not aware of that, no. 13 Q. Are you aware of who would have approved the 14 use of the promo code? 15 A. Who would have approved it? I mean, I -- I 16 don't know who did that code. I'm not aware 17 of who set it up or made it or requested it 18 or any of that, so... 19 I wasn't involved in any of that. 20 Q. Do you agree with Mike Lindell on the 21 Steve Bannon podcast there linking the 22 MyPillow promo code to the promotion of the 23 documentary claiming the 2020 election was 24 rigged? 25 A. The linking? Because of the word "proof"?</p>	<p style="text-align: right;">Page 60</p> <p>1 Absolute Proof. It could have been -- the 2 word of the code itself could have been 3 anything. 4 A. Gotcha. I mean, I don't know -- so he went 5 on a podcast that he goes on a lot, promoted 6 his new video documentary, and then also sold 7 pillows, so I don't -- I don't know. I don't 8 see an issue with talking about multiple 9 subjects. 10 Q. And -- but you would agree, then, that he was 11 going on this show to -- to both promote the 12 pod -- or to promote the documentary and to 13 sell MyPillow products? 14 A. I would say he talked about, yeah, multiple 15 things, yeah. 16 Q. Are you aware of the board ever discussing 17 this kind of connection between the MyPillow 18 promo codes and the Absolute Proof 19 documentary? 20 A. No, not that I recall. 21 Q. I want to watch another one here. I'll 22 represent to you that Mike Lindell appeared 23 on the Pete Santilli show on February 24th, 24 2021. We are going to play a clip from that 25 show, which was previously introduced as an</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024

61-64

<p style="text-align: right;">Page 61</p> <p>1 exhibit during Mike Lindell's deposition. 2 (Exhibit 671 marked.) 3 (Video playing.) 4 MIKE LINDELL: "You guys, I 5 want every -- I want everybody to know, I'm 6 not going after just them and Smartmatic. I 7 want to go after Twitter, Facebook, 8 Wikipedia, all the media, the media giants, 9 you know, all these giants that are behind 10 mainstream media. 11 "This problem runs so deep, and this 12 cancel culture and all this, but it's not 13 just Dominion it's -- and not just Smartmatic 14 and not just the machine. Look at what 15 they're doing. They're all part of this 16 attack on our country. 17 "I mean, mainstream media, they have 18 not had me on. Are you kidding? That should 19 have been the biggest news in history or one 20 of the biggest on February 5th with all this 21 new evidence I had that I came out and showed 22 that this is an attack by another country on 23 our country. Whether you're a Democrat or 24 Republican, you should be worried. My" -- 25 (unintelligible) -- "are going, This isn't</p>	<p style="text-align: right;">Page 63</p> <p>1 We're never going to give in. We thank you 2 for everything you're doing. Thank you. 3 Thank you, sir." 4 MIKE LINDELL: "Well, thank you. 5 And my employees thank you all. God bless 6 you. God bless you. 7 PETE SANTILLI: "Thank you. God 8 bless you, too. Stay strong, Mike. Thank 9 you very much for taking the time out. I 10 really appreciate it. All right. Thank you. 11 "All right, you guys. All right. 12 I've been telling you that this is that 13 moment in time where it's not just calling 14 upon Mike Lindell to do all the work on our 15 behalf. 16 "This is that moment in time in our 17 nation's history where each and every one of 18 us can do our part to expose the truth. You 19 should be invigorated and energized. You 20 heard it right here on the Pete Santilli 21 show. He's going on the offensive." 22 (Commercial playing.) 23 MIKE LINDELL: "Hello, I'm 24 Mike Lindell, and as you know, my passion is 25 to help each and every one of you get the</p>
<p style="text-align: right;">Page 62</p> <p>1 the Democrats in power right now. They're 2 squishing us, they're canceling us out. 3 "In a year from now, you wouldn't 4 even know we have a country, because nobody 5 will be able to communicate. That's the 6 first thing they're doing is taking away our 7 communications." 8 PETE SANTILLI: "That's right. 9 That's right. And these attacks upon you 10 personally and -- we're going to separate it, 11 because there are two different entities. 12 You let your employees know at mypillow.com 13 that's it's up to We the People that a 14 company like Bed Bath & Beyond has said that 15 I can't pull my wallet out and buy a MyPillow 16 at Bed Bath & Beyond. They're stopping me 17 from making that purchase. 18 "Well, guess what? We the People are 19 going to go around it, because that's the 20 fuel that is necessary in a free-market 21 economy to keep Americans employed so that we 22 can pursue the truth, and it's a huge truth. 23 "And, sir, let your employees know, 24 we stand behind your company. We stand 25 behind you. We're not going to back down.</p>	<p style="text-align: right;">Page 64</p> <p>1 best sleep of your life. That's why I 2 created my new Giza Dreams bed sheets. I 3 started by using the world's best cotton 4 called Giza. It's only grown in a region 5 between the Sahara Desert, the Mediterranean 6 Sea, and the Nile River. It's ultra soft and 7 breathable, but extremely durable. My Giza 8 sheets also include full 21-inch wide 9 pillowcases that will fit over any pillow and 10 deep-pocket sheets the will fit over any 11 mattress. The first night you sleep on my 12 sheets, you'll never want to sleep on 13 anything else." 14 UNIDENTIFIED SPEAKER: "Go to 15 mypillow.com or call the number on your 16 screen right now to get your very own 17 MyPillow Giza Dream sheets. Giza Dream 18 sheets are available in a variety of colors. 19 Use the promo code and Mike will give you two 20 for one low price and free shipping. That's 21 right, get two for one low price, plus free 22 shipping." 23 "For the best night's sleep in the 24 whole wide world, visit mypillow.com." 25 (Video stopped.)</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024

65-68

<p style="text-align: right;">Page 65</p> <p>1 BY MR. FREY:</p> <p>2 Q. Okay. Did you recognize Mike Lindell on that</p> <p>3 Pete Santilli podcast?</p> <p>4 A. Yes.</p> <p>5 Q. And did you hear at the beginning</p> <p>6 Mr. Mike Lindell stated that he -- you know,</p> <p>7 he's not just attacking Smartmatic, he's</p> <p>8 attacking others too, but --</p> <p>9 A. Yep, I heard that, yeah.</p> <p>10 Q. -- discussed attacking Smartmatic?</p> <p>11 And Mike Lindell also spoke about</p> <p>12 cancel culture and this -- his kind of false</p> <p>13 election campaign's impact upon his company,</p> <p>14 MyPillow?</p> <p>15 A. Yep, I recall seeing that.</p> <p>16 Q. And then the MyPillow advertisement actually</p> <p>17 ran --</p> <p>18 MR. KACHOUROFF: As to the last</p> <p>19 question, I -- objection to form, and I'm not</p> <p>20 sure what -- if I understood the question.</p> <p>21 His kind of false election campaign's</p> <p>22 impact --</p> <p>23 THE WITNESS: I'm just saying I</p> <p>24 saw the video that he's referring to. I</p> <p>25 mean, if he wants -- I guess, I don't --</p>	<p style="text-align: right;">Page 67</p> <p>1 show both espousing his claims of election</p> <p>2 fraud and marketing for MyPillow?</p> <p>3 A. I mean, the looks of that with the</p> <p>4 commercials, we advertise on this guy's show</p> <p>5 all the time. So, yeah, he came on today to</p> <p>6 do an interview. I don't think that the</p> <p>7 advertising was specifically because he was</p> <p>8 on. I think it's probably shown every time</p> <p>9 his show is on.</p> <p>10 Q. Every time the Pete Santilli show is on?</p> <p>11 A. Would be my guess, yeah, the way that was</p> <p>12 like an actual commercial that was shown and</p> <p>13 had his own promo code and everything.</p> <p>14 Pete is, I'm assuming, referring to</p> <p>15 Pete Santilli. So he must be someone that we</p> <p>16 advertise with quite a bit.</p> <p>17 Q. Okay.</p> <p>18 A. And then Mike does go on these shows every</p> <p>19 now and then and do interviews. So that's</p> <p>20 what I'm seeing here is what happened.</p> <p>21 Q. And does Mike's appearance on these shows, is</p> <p>22 that part of the kind of advertising</p> <p>23 marketing strategy for MyPillow?</p> <p>24 A. I'm not -- I'm not aware of if that's part of</p> <p>25 a strategy for the radio department or the --</p>
<p style="text-align: right;">Page 66</p> <p>1 characterize it however you want. I saw the</p> <p>2 video you just showed me.</p> <p>3 BY MR. FREY:</p> <p>4 Q. Okay. Yeah, the question was just -- that's</p> <p>5 fine.</p> <p>6 A. Yeah, I didn't mean to --</p> <p>7 Q. And then there was a MyPillow advertisement</p> <p>8 that ran at the back of that podcast?</p> <p>9 A. Yes.</p> <p>10 Q. And there was also a promo code "Pete" that</p> <p>11 was used?</p> <p>12 A. Yep.</p> <p>13 Q. And I guess similar to the promo code that we</p> <p>14 just discussed, "Proof," are you aware of who</p> <p>15 would have approved the use of this promo</p> <p>16 code, "Pete"?</p> <p>17 A. "Pete"? It seems like a radio guy maybe, so</p> <p>18 probably the radio department.</p> <p>19 Q. Okay. And did the -- did the board have any</p> <p>20 oversight over the use of a promo code on</p> <p>21 this Pete Santilli show?</p> <p>22 A. Not that I recall.</p> <p>23 Q. And would you agree that similar to the</p> <p>24 Steve Bannon podcast we watched,</p> <p>25 Mr. Mike Lindell was on the Pete Santilli</p>	<p style="text-align: right;">Page 68</p> <p>1 Q. That's not your -- that's not your area?</p> <p>2 A. That's not -- yeah, I'm not in that area,</p> <p>3 so...</p> <p>4 Q. Okay. Are you -- again, I believe the answer</p> <p>5 is going to be no, but are you aware of any</p> <p>6 discussion with the board about</p> <p>7 Mr. Mike Lindell appearing on these shows to</p> <p>8 espouse election fraud claims while</p> <p>9 representing himself as the CEO of MyPillow?</p> <p>10 A. No. No. I don't recall any talks on the</p> <p>11 board about that, no.</p> <p>12 Q. And so fair to say, then, that the board</p> <p>13 didn't take any action to stop</p> <p>14 Mr. Mike Lindell from doing those kinds of</p> <p>15 appearances?</p> <p>16 A. I don't recall that, no.</p> <p>17 Q. Okay. I want to talk now a little bit more</p> <p>18 about Absolute Proof --</p> <p>19 A. Okay.</p> <p>20 Q. -- the Absolute Proof documentary.</p> <p>21 So I'm handing you what will be</p> <p>22 marked as Exhibit 660.</p> <p>23 MR. FREY: Chris, for you, this is</p> <p>24 Tab 22.</p> <p>25 MR. KACHOUROFF: Thank you.</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024
69-72

<p style="text-align: right;">Page 69</p> <p>1 (Exhibit 660 marked.)</p> <p>2 BY MR. FREY:</p> <p>3 Q. And you'll see, when you get this, it's a</p> <p>4 series of three pictures, and it's got a</p> <p>5 Bates label SMARTMATIC-LINDELL 0006, 0031,</p> <p>6 0020 on the lower right-hand corner.</p> <p>7 A. Uh-huh.</p> <p>8 Q. And these are photos of a warehouse</p> <p>9 inspection that was conducted as part of this</p> <p>10 litigation in November of 2022. Smartmatic</p> <p>11 did the inspection took those photos, and</p> <p>12 then produced them.</p> <p>13 And if you see here in the first</p> <p>14 picture on page 0006, those look like crates</p> <p>15 of boxes that state, "Absolute Proof DVDs."</p> <p>16 Do you see that?</p> <p>17 A. Yes.</p> <p>18 Q. And if you turn to the next page, it's blown</p> <p>19 up, "Absolute Proof DVD 4,500."</p> <p>20 Do you see that?</p> <p>21 A. Yep, I see it.</p> <p>22 Q. And so were you aware that MyPillow was</p> <p>23 storing DVDs of Absolute Proof in the</p> <p>24 warehouse?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 71</p> <p>1 Absolute Proof DVD?</p> <p>2 A. No --</p> <p>3 MR. KACHOUROFF: Objection to</p> <p>4 form.</p> <p>5 Go ahead. Sorry.</p> <p>6 THE WITNESS: I would say he was</p> <p>7 receiving them.</p> <p>8 BY MR. FREY:</p> <p>9 Q. He was receiving them --</p> <p>10 A. At the warehouse, to store them.</p> <p>11 Q. Okay. And then to mail out if they were</p> <p>12 ordered?</p> <p>13 A. Yeah. I mean, we would mail out a single</p> <p>14 DVD. This is obviously case packs and</p> <p>15 everything. So we're -- Todd is receiving it</p> <p>16 in, inventorying it, and then we'll ship it</p> <p>17 out when a customer orders it.</p> <p>18 Q. Okay. And as -- as COO, were you involved, I</p> <p>19 guess, in that -- in that process?</p> <p>20 A. I don't recall being involved in it.</p> <p>21 Q. Do you recall any board discussions about</p> <p>22 using the MyPillow facilities to store and</p> <p>23 mail out the Absolute Proof DVDs?</p> <p>24 A. No. Not that I recall, no.</p> <p>25 Q. Did MyPillow ever give away DVDs of</p>
<p style="text-align: right;">Page 70</p> <p>1 Q. Why -- what was the purpose of storing the</p> <p>2 Absolute Proof DVDs at the MyPillow</p> <p>3 warehouse?</p> <p>4 A. We would ship them out if someone bought</p> <p>5 them. We do shipping for not just MyPillow,</p> <p>6 but we have MyStore, we have lots of other</p> <p>7 vendors. So if someone bought one from him,</p> <p>8 then we would ship it out.</p> <p>9 Q. Okay. And so were MyPillow employees</p> <p>10 involved in shipping out the Absolute Proof</p> <p>11 DVDs?</p> <p>12 A. Yes.</p> <p>13 Q. And if you look at this one on page 31, the</p> <p>14 second photo here, the label right over,</p> <p>15 "Proof," says, "Ship to mypillow.com," and</p> <p>16 then it's got an address, 2101 Fourth Avenue</p> <p>17 East, Suite 100, Shakopee, Minnesota, and</p> <p>18 then, "Attention: Todd Taylor."</p> <p>19 Do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. And who is Todd Taylor?</p> <p>22 A. He is the VP of operations.</p> <p>23 Q. Okay. And so is it fair to say there that --</p> <p>24 that Todd Taylor, the VP operations, was</p> <p>25 actually ordering these copies of the</p>	<p style="text-align: right;">Page 72</p> <p>1 Absolute Proof?</p> <p>2 A. I don't recall that happening, no.</p> <p>3 Q. Are you familiar -- well, actually, it's been</p> <p>4 about an hour. Do you want to go off the</p> <p>5 record, take a quick five-minute break?</p> <p>6 A. Yeah, that's fine. Yeah.</p> <p>7 MR. FREY: Let's go off the</p> <p>8 record.</p> <p>9 THE VIDEOGRAPHER: We're going off</p> <p>10 the record. The time now is 10:39 a.m.</p> <p>11 (Recess.)</p> <p>12 THE VIDEOGRAPHER: We are going</p> <p>13 back on the record. The time now is</p> <p>14 10:47 a.m.</p> <p>15 BY MR. FREY:</p> <p>16 Q. All right. Welcome back. Thank you for that</p> <p>17 break.</p> <p>18 I just want to make clear for the</p> <p>19 record, so, obviously, both you and</p> <p>20 Mike Lindell are Mr. Lindell, and so I'm</p> <p>21 doing my best in my questions to be clear to</p> <p>22 you when I'm referring to Mike Lindell to say</p> <p>23 Mike Lindell as opposed to Mr. Lindell. But</p> <p>24 if it's ever unclear, just let me know.</p> <p>25 A. Will do.</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024
73-76

<p style="text-align: right;">Page 73</p> <p>1 Q. Okay. Okay.</p> <p>2 So, Mr. Lindell, are you familiar</p> <p>3 with the cyber symposium that Mike Lindell</p> <p>4 hosted in South Dakota in August of 2021?</p> <p>5 A. I'm aware of it, yeah.</p> <p>6 Q. Did you assist with any planning or</p> <p>7 preparation for the cyber symposium?</p> <p>8 A. I don't recall assisting at all, no.</p> <p>9 Q. Do you know of any other MyPillow employees</p> <p>10 who assisted with planning or preparation for</p> <p>11 the cyber symposium?</p> <p>12 A. I'm not aware of any, no.</p> <p>13 Q. Do you know of any MyPillow employees who</p> <p>14 helped promote the cyber symposium?</p> <p>15 A. I'm not aware of any, no.</p> <p>16 Q. Did you attend the cyber symposium?</p> <p>17 A. I did not.</p> <p>18 Q. Do you know of any other my -- any MyPillow</p> <p>19 employees who attended the cyber symposium?</p> <p>20 A. I don't recall any.</p> <p>21 Q. Are you aware that Mike Lindell promoted</p> <p>22 MyPillow products and promo codes during the</p> <p>23 cyber symposium?</p> <p>24 A. I wasn't directly aware, but I would not be</p> <p>25 surprised that he would promote --</p>	<p style="text-align: right;">Page 75</p> <p>1 Mike Lindell. I'm coming to you with the</p> <p>2 most important commercial that I have ever</p> <p>3 done. All of you know what MyPillow and</p> <p>4 myself have gone through in the last five</p> <p>5 months in my effort to bring the truth</p> <p>6 forward."</p> <p>7 Do you see that?</p> <p>8 A. Yep.</p> <p>9 Q. And then it goes on to say, "I'm having a</p> <p>10 cyber symposium on August 10th, 11th, and</p> <p>11 12th. This historical event will be</p> <p>12 livestreamed 72 hours straight on my new</p> <p>13 platform, frankspeech.com."</p> <p>14 Do you see that?</p> <p>15 A. Yep.</p> <p>16 Q. Okay. And then he says, "To help support the</p> <p>17 cyber symposium event, I'm offering some of</p> <p>18 the best prices ever on MyPillow products,</p> <p>19 but they are only offered on frankspeech.com.</p> <p>20 Go to frankspeech.com now to receive these</p> <p>21 exclusive MyPillow offers."</p> <p>22 Do you see that?</p> <p>23 A. Yes.</p> <p>24 Q. So were you aware that Mike Lindell was</p> <p>25 promoting to viewers to support the cyber</p>
<p style="text-align: right;">Page 74</p> <p>1 Q. It doesn't surprise you that --</p> <p>2 A. No, he promotes products.</p> <p>3 Q. Okay. So I want to look quickly at what will</p> <p>4 be marked as Exhibit 661.</p> <p>5 MS. LOFTUS: Chris, it's</p> <p>6 number 23.</p> <p>7 (Exhibit 661 marked.)</p> <p>8 BY MR. FREY:</p> <p>9 Q. And this is, again, it's captured by</p> <p>10 Page Vault, so you can see there in the lower</p> <p>11 left corner it's a document titled,</p> <p>12 "frankspeech.com" with the URL</p> <p>13 "www.mypillow.com/frankspeech."</p> <p>14 Do you see that?</p> <p>15 A. Uh-huh. Yep.</p> <p>16 Q. And so that -- that FrankSpeech landing page</p> <p>17 then, would have been off of the MyPillow</p> <p>18 website; is that right?</p> <p>19 A. Yeah, it looks like a landing page on our</p> <p>20 site, yeah.</p> <p>21 Q. Okay. And do you see that this is an</p> <p>22 advertisement for a flash sale?</p> <p>23 A. Yep.</p> <p>24 Q. And there's some text underneath the picture</p> <p>25 there, and it reads, "Hello, I'm</p>	<p style="text-align: right;">Page 76</p> <p>1 symposium by buying MyPillow products?</p> <p>2 A. I wouldn't have been involved in creating any</p> <p>3 of this or that advertising, so, no. I mean,</p> <p>4 not directly aware of it.</p> <p>5 Q. Did the board ever discuss tying the</p> <p>6 promotion of MyPillow products to support of</p> <p>7 the cyber symposium?</p> <p>8 A. I don't recall that, no.</p> <p>9 Q. You can set that one to the side.</p> <p>10 So this FrankSpeech website is -- is</p> <p>11 discussed, I guess, in this document we just</p> <p>12 looked at, correct?</p> <p>13 A. Yep, he brings up the site, yeah.</p> <p>14 Q. Are you familiar with the website called</p> <p>15 FrankSpeech?</p> <p>16 A. Yes.</p> <p>17 Q. And what is FrankSpeech?</p> <p>18 A. It's his news website, I guess. The news --</p> <p>19 show -- bunch of shows on there, talk about</p> <p>20 politics a lot.</p> <p>21 Q. Okay. Were -- did you participate in any</p> <p>22 capacity in the planning or development of</p> <p>23 FrankSpeech?</p> <p>24 A. No.</p> <p>25 Q. Do you know of any other MyPillow employees</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024

77-80

<p style="text-align: right;">Page 77</p> <p>1 who participated in the development of</p> <p>2 FrankSpeech?</p> <p>3 A. Not that I'm aware, no.</p> <p>4 Q. Do you know who was involved in the planning</p> <p>5 and development of FrankSpeech?</p> <p>6 A. Beyond Mike? No. I wouldn't know anyone</p> <p>7 specifically. I might recognize a name here</p> <p>8 and there from just hearing it, but, no.</p> <p>9 Q. Have you discussed FrankSpeech with</p> <p>10 Mike Lindell?</p> <p>11 A. Have I discussed it? I'm sure we've talked</p> <p>12 about it at some point, but nothing --</p> <p>13 nothing as far as development or, you know,</p> <p>14 maybe he said, hey, look at my site,</p> <p>15 FrankSpeech, something like that, more of a</p> <p>16 father-son thing.</p> <p>17 Q. Okay. Has he told you kind of why he created</p> <p>18 the FrankSpeech?</p> <p>19 A. No, not really.</p> <p>20 Q. And you said that he, you know, posts videos</p> <p>21 and news items, political stuff. I'm trying</p> <p>22 to find it in my realtime here. I don't want</p> <p>23 to mischaracterize you. But is it fair to</p> <p>24 say those are the types of --</p> <p>25 A. Yeah, news stuff, podcasts, shows that he has</p>	<p style="text-align: right;">Page 79</p> <p>1 nothing like that was discussed.</p> <p>2 Q. What do you mean by "front end"?</p> <p>3 A. Well, like, the customer side or the viewer</p> <p>4 side, tying them together, we don't -- we</p> <p>5 haven't really discussed any of that.</p> <p>6 Q. Okay.</p> <p>7 A. If that's what -- I'm not sure what you meant</p> <p>8 by your question, as far as tying them</p> <p>9 together.</p> <p>10 Q. That was the first part of my question, yeah.</p> <p>11 Like, has the -- have you as COO, or</p> <p>12 as a board member, had any discussions</p> <p>13 regarding, hey, should we -- should we, you</p> <p>14 know, link the MyPillow web page and MyPillow</p> <p>15 products with FrankSpeech?</p> <p>16 A. No, I don't recall any, like, discussions as</p> <p>17 far as that. No.</p> <p>18 Q. Okay. You don't recall any discussions like</p> <p>19 on -- at a board meeting?</p> <p>20 A. No, I don't recall that. No.</p> <p>21 Q. Do you yourself subscribe to FrankSpeech?</p> <p>22 A. The email list? I do.</p> <p>23 Q. Okay. I want to look at one of the emails</p> <p>24 from FrankSpeech that I believe was sent to</p> <p>25 you. This will be marked as Exhibit 662.</p>
<p style="text-align: right;">Page 78</p> <p>1 on there and whatnot.</p> <p>2 Q. Okay. Are you aware that the documentaries</p> <p>3 we discussed before, the Absolute Proof</p> <p>4 series, is posted on FrankSpeech?</p> <p>5 A. Yeah, I think I'm aware of that, yeah.</p> <p>6 Q. And in -- I guess we just talked about</p> <p>7 Absolute Proof before.</p> <p>8 Are you aware that there were three</p> <p>9 more documentaries published by Mike Lindell</p> <p>10 regarding election fraud and claims of voting</p> <p>11 machines rigging the election?</p> <p>12 A. I knew there was more than one documentary.</p> <p>13 Q. Okay. And are you aware that in each of</p> <p>14 those documentaries claims were made that the</p> <p>15 2020 election was rigged?</p> <p>16 A. I've not watched them, so I was not aware of</p> <p>17 the content specifically.</p> <p>18 Q. Have -- have you ever participated in any</p> <p>19 discussions related to whether the</p> <p>20 FrankSpeech website should be tied to</p> <p>21 MyPillow?</p> <p>22 A. There's been discussions as far as</p> <p>23 operationally, the making sure that shipments</p> <p>24 come down a certain way and stuff like that.</p> <p>25 Nothing as far as front end, you know,</p>	<p style="text-align: right;">Page 80</p> <p>1 (Exhibit 662 marked.)</p> <p>2 MR. FREY: And, Chris, this is</p> <p>3 Tab 4.</p> <p>4 BY MR. FREY:</p> <p>5 Q. Do you see here this is marked with Bates</p> <p>6 label DEF026737.0001.</p> <p>7 Do you see that in the bottom right</p> <p>8 corner?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And I'll represent it's an email that</p> <p>11 was produced to us by defendants in this</p> <p>12 case.</p> <p>13 And so it's from FrankSpeech in the</p> <p>14 top left, correct?</p> <p>15 A. Yes.</p> <p>16 Q. And then I believe, is that your email</p> <p>17 address, darren@mypillow.com?</p> <p>18 A. Yes.</p> <p>19 Q. And dated September 8th, 2022, right?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. So at least as of September 8th, 2022,</p> <p>22 like you said, you were subscribing to the</p> <p>23 mailer, the FrankSpeech mailer -- or email?</p> <p>24 A. The email, yep.</p> <p>25 Q. Do you recall when you -- when you first</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024

81-84

<p style="text-align: right;">Page 81</p> <p>1 subscribed?</p> <p>2 A. I think our -- I think I was just added to</p> <p>3 it. I don't believe I ever clicked</p> <p>4 subscribe.</p> <p>5 Q. Okay. And do you -- was it that --</p> <p>6 A. Like a test thing or something, because they</p> <p>7 just needed a -- if I ever want to look at it</p> <p>8 and see an error or something like that, you</p> <p>9 know.</p> <p>10 Q. Okay. So kind of in your operational</p> <p>11 capacity, you were --</p> <p>12 A. Just helping out. I mean, I wouldn't say it</p> <p>13 was a MyPillow operational thing or anything</p> <p>14 like that. Just give him a subscriber, you</p> <p>15 know, why not.</p> <p>16 Q. Okay. Do you know if other MyPillow</p> <p>17 employees were similarly added to --</p> <p>18 A. No. I -- Nick does our emails. I would</p> <p>19 probably just say, Throw me on there, you</p> <p>20 know.</p> <p>21 Q. And who is Nick?</p> <p>22 A. Nick is -- just works in our email. He does</p> <p>23 our email marketing.</p> <p>24 Q. Okay. Do you know his last name?</p> <p>25 A. Dressen.</p>	<p style="text-align: right;">Page 83</p> <p>1 information will be the final nail in the</p> <p>2 coffin for the proof that electronic voting</p> <p>3 machines are stealing your voice."</p> <p>4 Do you see that?</p> <p>5 A. Yep.</p> <p>6 Q. Have you, you yourself, ever seen the alleged</p> <p>7 information collected by Dennis Montgomery?</p> <p>8 A. No.</p> <p>9 Q. Have you ever discussed the information that</p> <p>10 Mr. Montgomery allegedly collected with</p> <p>11 Mike Lindell?</p> <p>12 A. No, I don't recall doing that. No.</p> <p>13 Q. Has the MyPillow board ever discussed the</p> <p>14 information allegedly collected by</p> <p>15 Dennis Montgomery?</p> <p>16 A. I don't recall that, no.</p> <p>17 Q. Okay. I want to move on to a separate</p> <p>18 exhibit. You can set that aside.</p> <p>19 MR. FREY: Chris, this will be</p> <p>20 Tab 12, and we'll mark it as Exhibit 663.</p> <p>21 For the record, the Bates label is</p> <p>22 DEF061612.00001.</p> <p>23 (Exhibit 663 marked.)</p> <p>24 BY MR. FREY:</p> <p>25 Q. And do you see that this is an email chain</p>
<p style="text-align: right;">Page 82</p> <p>1 Q. Can you spell that?</p> <p>2 A. D-R-E-S-S-E-N.</p> <p>3 Q. Got it.</p> <p>4 And he's the -- does the email</p> <p>5 marketing for MyPillow?</p> <p>6 A. Correct.</p> <p>7 Q. And so looking at this -- this message</p> <p>8 itself, it says, "Hello from Mike Lindell. I</p> <p>9 have exciting news. Do you know who</p> <p>10 Dennis Montgomery is?"</p> <p>11 Do you see that?</p> <p>12 A. Yes.</p> <p>13 Q. Do you know yourself know who</p> <p>14 Dennis Montgomery is?</p> <p>15 A. Me?</p> <p>16 Q. Yeah.</p> <p>17 A. No. I've heard the name. I don't know who</p> <p>18 he is.</p> <p>19 Q. Have you ever met Dennis Montgomery?</p> <p>20 A. I don't believe so, no.</p> <p>21 Q. Have you ever discussed Dennis Montgomery</p> <p>22 with Mike Lindell?</p> <p>23 A. I don't recall ever discussing him.</p> <p>24 Q. Okay. A little bit -- so the next -- skip a</p> <p>25 paragraph. It then says, "Montgomery's</p>	<p style="text-align: right;">Page 84</p> <p>1 that ends in November 16th, 2021?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. And I don't know if you've had to do</p> <p>4 this before, so I apologize. When we print</p> <p>5 out emails like this, it usually goes, like,</p> <p>6 back to front. So the --</p> <p>7 A. Oh, gotcha.</p> <p>8 Q. -- the oldest email will be in the back and</p> <p>9 then it goes --</p> <p>10 A. Yep.</p> <p>11 Q. -- forward in time.</p> <p>12 And so this email chain, if you look</p> <p>13 at the base email, is from a Jazmin Kampen.</p> <p>14 Do you see that?</p> <p>15 A. Yep.</p> <p>16 Q. And it says she's the manager of e-commerce</p> <p>17 at MyPillow; is that accurate?</p> <p>18 A. I believe it's still accurate, yeah.</p> <p>19 Q. Okay. And she writes -- and you can't see on</p> <p>20 this first email who it goes to, but she</p> <p>21 writes, "Hey, Mike just sent over a</p> <p>22 FrankSpeech flyer he wants in all the orders</p> <p>23 going out. About how many are we talking?</p> <p>24 Like, what do we ship out a day?"</p> <p>25 Do you see that?</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024

85-88

<p style="text-align: right;">Page 85</p> <p>1 A. Yes.</p> <p>2 Q. And then if you flip over to the next one,</p> <p>3 you can see the recipients now, it's just the</p> <p>4 way that the production is put in, header</p> <p>5 addresses, what you see is the</p> <p>6 David Grapentine, yourself, and Mike Lindell?</p> <p>7 A. Yep.</p> <p>8 Q. And so David Grapentine is identified as the</p> <p>9 vice-president of shipping.</p> <p>10 Does that sound accurate?</p> <p>11 A. I think his title has since changed, but</p> <p>12 similar role, yep.</p> <p>13 Q. Okay. Okay. And so he says, "We will need</p> <p>14 about 25,000 a day right now. We'll increase</p> <p>15 once these temps come in and we're able to</p> <p>16 ship more per day."</p> <p>17 MR. KACHOUROFF: Hey, Tim, this is</p> <p>18 Chris, can I -- Darren, I want you to read</p> <p>19 the email so you have at least a cold</p> <p>20 context. Read the whole thing start to</p> <p>21 finish so you understand. If he's going to</p> <p>22 ask you questions about a document, I want</p> <p>23 you to know what they're talking about.</p> <p>24 THE WITNESS: Okay.</p> <p>25 BY MR. FREY:</p>	<p style="text-align: right;">Page 87</p> <p>1 MyPillow products that were sent out?</p> <p>2 A. Yeah, I mean, we -- we do that, and I assume</p> <p>3 this date is good and, yeah, so...</p> <p>4 Q. Okay.</p> <p>5 A. I'm sure it was a few weeks after we got them</p> <p>6 in and started doing it.</p> <p>7 Q. And is that just kind of common practice</p> <p>8 whenever you send orders out, MyPillow orders</p> <p>9 out, or MyStore orders out, these three or</p> <p>10 four brochures --</p> <p>11 A. Yep, exactly.</p> <p>12 Q. Okay. Did you have any role or -- in</p> <p>13 discussions about -- about including the</p> <p>14 FrankSpeech flyers in MyPillow, like</p> <p>15 front-end discussion?</p> <p>16 A. I don't believe so, no. I think this is</p> <p>17 probably when I was aware of it. And then as</p> <p>18 I can tell here, I just suggested outsourcing</p> <p>19 the printing instead of doing it in-house</p> <p>20 because of the amount, so...</p> <p>21 Q. Okay. Okay. And then how do -- you're over</p> <p>22 the top of the persons responsible for</p> <p>23 actually sending the orders out, right?</p> <p>24 A. Yep.</p> <p>25 Q. Okay. And so is it -- how does the process</p>
<p style="text-align: right;">Page 86</p> <p>1 Q. Sure. Take your time.</p> <p>2 A. (Reviews document.) Okay.</p> <p>3 Q. Okay.</p> <p>4 A. Good.</p> <p>5 Q. Okay. Okay. So this email chain is</p> <p>6 discussing including FrankSpeech flyers in</p> <p>7 orders that are going out, right?</p> <p>8 A. Correct.</p> <p>9 Q. And is that -- is that MyPillow orders that</p> <p>10 were going out?</p> <p>11 A. MyPillow and MyStore.</p> <p>12 Q. Okay.</p> <p>13 A. Yes.</p> <p>14 Q. So it would be anything ordered from those --</p> <p>15 from MyPillow or MyStore would -- is that</p> <p>16 like the -- is that like the brochure you</p> <p>17 were talking about earlier where --</p> <p>18 A. We have a brochure, MyPillow brochure, we</p> <p>19 have a MyStore flyer, and then it would be</p> <p>20 this flyer you're talking about here.</p> <p>21 Q. Okay.</p> <p>22 A. And a bible verse.</p> <p>23 Q. Okay. And so do you recall, then, that</p> <p>24 beginning in November of 2021, MyPillow would</p> <p>25 include FrankSpeech flyers in shipments of</p>	<p style="text-align: right;">Page 88</p> <p>1 work in terms of logistically putting the</p> <p>2 brochures in the packets, getting them out</p> <p>3 the door, kind of how does that work?</p> <p>4 A. So we actually will take the booklet, the two</p> <p>5 flyers, put the two flyers in the booklet,</p> <p>6 get them -- stack them up and get them</p> <p>7 moving, and then when they're going to ship</p> <p>8 it, they just grab -- they're kind of tied</p> <p>9 together so you can just put it in there.</p> <p>10 Q. Okay.</p> <p>11 A. Grabbing four things at one time is going to</p> <p>12 take forever, so...</p> <p>13 Q. So it's kind of --</p> <p>14 A. Yeah.</p> <p>15 Q. At some point you pre-put them together</p> <p>16 and --</p> <p>17 A. Yeah. Put them together, they're just sort</p> <p>18 of -- so it's one piece that you have to grab</p> <p>19 instead of four things.</p> <p>20 Q. Okay. Okay. Got it.</p> <p>21 Do you know why MyPillow began</p> <p>22 putting FrankSpeech flyers in its orders?</p> <p>23 A. No, I'm not really aware of that.</p> <p>24 Q. Do you know who decided to put the</p> <p>25 FrankSpeech flyers in the MyPillow orders?</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024

89-92

<p style="text-align: right;">Page 89</p> <p>1 A. Mike, I would assume. 2 Q. Okay. 3 A. It's his thing. 4 Q. Okay. You can set this one to the side. 5 Now I want to look at the document 6 that was previously marked as Exhibit 98. 7 MR. FREY: And, Chris -- 8 MR. KACHOUROFF: I have it. 9 MR. FREY: You have it? Okay. 10 BY MR. FREY: 11 Q. And do you see here, there's a long list of 12 recipients on this email, but it's 13 Bates-stamped DEF122127.00001. And it's from 14 a Robert Way to the large group of people. 15 A. Yep. 16 Q. If you go to the fourth page, it says, 17 "Subject: New product alert, frankspeech.com 18 yard signs?" 19 A. Yes. 20 Q. Who is Robert Way? 21 A. He is our VP of communications, I believe. 22 What does his title say on here? I'm not 23 sure if it's changed since. 24 Yeah, VP of communications. Yep. 25 Q. Okay.</p>	<p style="text-align: right;">Page 91</p> <p>1 went ahead and did offer FrankSpeech yard 2 signs? 3 A. Yeah, I believe we sold them on our site, 4 yeah. 5 Q. Do you still sell them today? 6 A. I don't believe so, no. 7 Q. Okay. Do you have any idea of when that -- 8 that would have stopped? 9 A. No. Maybe when we ran out of them. I don't 10 think they were like a huge seller or 11 anything, so... 12 Q. Okay. Did you -- did you participate in any 13 conversations about offering FrankSpeech yard 14 signs from MyPillow? 15 A. I don't recall as far as, again, on the front 16 end. Once we got them, there might have been 17 discussions how do we want to ship these, how 18 do we want to package them, what kind of 19 cases and stuff so... 20 But to sell them, I don't remember 21 any discussion. 22 Q. Okay. And would the work in, you know, 23 packaging them, shipping them, the 24 operational side, would that have been 25 MyPillow employees who were doing that?</p>
<p style="text-align: right;">Page 90</p> <p>1 A. So he's sending an email out anytime we 2 launch new product or there's a new product 3 on the website, he's going to let all these 4 people know who are -- I mean, it seems like 5 pretty much everyone. 6 Q. Okay. This -- yeah, it's a lot of emails. 7 A. Yeah. 8 Q. Okay. And if you go to the fourth page where 9 you get to the substance of the email, it 10 says, "Hi everyone" -- or, "Hello everyone. 11 We will now be offering frankspeech.com yard 12 signs on https://www.mypillow.com/frank." 13 Do you see that? 14 A. Yep. 15 Q. Then it's got the four products. And then it 16 says, "All these options ship for free with 17 the use of a promo code." 18 Yeah. Do you see that? 19 A. Yep. 20 Q. Okay. And the promo code, is that similar 21 promo codes to what we were discussing 22 earlier, where you would have different codes 23 for discounts for customers on -- 24 A. Correct, yeah. 25 Q. Do you know whether, in fact, MyPillow then</p>	<p style="text-align: right;">Page 92</p> <p>1 A. Yep. I mean, again, we drop-ship for other 2 companies, so that's not out of the norm. 3 Q. Okay. What other companies do you guys do 4 drop-shipping for? 5 A. So anyone on MyStore is an outsourced vendor, 6 so there's hundreds of them. 7 Q. Okay. 8 A. They're more mom and pop, small, you know, 9 made-in-America products and stuff like that, 10 but, so... 11 Q. Got it. Okay. Okay. 12 I want to talk now about your 13 personal understanding of the 2020 election. 14 A. Okay. 15 Q. So are you aware that there was an election 16 in the United States on November 3rd, 2020? 17 A. Yes. 18 Q. Are you aware that one of the elections on 19 November 3rd, 2020, was between Joe Biden and 20 Donald Trump for the president of the 21 United States? 22 A. Yes. 23 Q. Are you aware that Joe Biden won the 2020 24 election for president of the United States? 25 A. Yes.</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024
93-96

<p style="text-align: right;">Page 93</p> <p>1 Q. Did you vote in the 2020 election?</p> <p>2 A. I did.</p> <p>3 Q. Who did you vote for in the race for</p> <p>4 president of the United States in the 2020</p> <p>5 election?</p> <p>6 A. You're going to make me answer that, huh?</p> <p>7 Joe Biden.</p> <p>8 Q. As of February 5th, 2021, did you understand</p> <p>9 that Joe Biden had won the 2020 election for</p> <p>10 president of the United States?</p> <p>11 A. Yes.</p> <p>12 Q. As of February 5th, 2021, did you understand</p> <p>13 that Donald Trump had lost the 2020 election</p> <p>14 for president of the United States?</p> <p>15 A. Yes.</p> <p>16 Q. As of February 5th, 2021, did you understand</p> <p>17 that Smartmatic voting machines did not</p> <p>18 change votes cast for Donald Trump to votes</p> <p>19 for Joe Biden?</p> <p>20 A. Was I aware they didn't do it?</p> <p>21 Q. You understood that Smartmatic voting</p> <p>22 machines did not change the votes, correct?</p> <p>23 MR. KACHOUROFF: Objection to</p> <p>24 form. Objection -- well, I've leave it at</p> <p>25 that.</p>	<p style="text-align: right;">Page 95</p> <p>1 machines had changed votes cast for</p> <p>2 Donald Trump to votes for Joe Biden?</p> <p>3 A. No.</p> <p>4 Q. As of February 5th, 2021, had you seen any</p> <p>5 document prepared by an elected official</p> <p>6 indicating that Smartmatic voting machines</p> <p>7 had changed votes for Donald Trump to votes</p> <p>8 for Joe Biden?</p> <p>9 A. No.</p> <p>10 Q. As of February 5th, 2021, had you seen any</p> <p>11 document prepared by a government official</p> <p>12 indicating that Smartmatic voting machines</p> <p>13 had changed votes cast for Donald Trump to</p> <p>14 votes for Joe Biden?</p> <p>15 A. No.</p> <p>16 Q. As of February 5th, 2021, did you understand</p> <p>17 that Smartmatic voting machines did not</p> <p>18 inflate the number of votes cast for</p> <p>19 Joe Biden?</p> <p>20 MR. KACHOUROFF: Objection to</p> <p>21 form.</p> <p>22 THE WITNESS: Again, was I aware</p> <p>23 of that? Well, I can't be aware of something</p> <p>24 I'm not even thinking about, I guess. I</p> <p>25 don't know. I didn't even know about</p>
<p style="text-align: right;">Page 94</p> <p>1 THE WITNESS: I don't think I was</p> <p>2 aware either way. I wasn't looking into</p> <p>3 that.</p> <p>4 BY MR. FREY:</p> <p>5 Q. As of -- as of February 5th, 2021, did you</p> <p>6 believe that Smartmatic voting machines had</p> <p>7 changed votes cast for Donald Trump to votes</p> <p>8 changed -- to votes for Joe Biden?</p> <p>9 A. Again, I didn't --</p> <p>10 MR. KACHOUROFF: Objection to</p> <p>11 form.</p> <p>12 THE WITNESS: I'm not -- I didn't</p> <p>13 believe either way. I wasn't aware of this</p> <p>14 controversy. I don't know what you want to</p> <p>15 call it.</p> <p>16 BY MR. FREY:</p> <p>17 Q. As of February 5th, 2021, had any elected</p> <p>18 official told you that Smartmatic voting</p> <p>19 machines had changed votes cast for</p> <p>20 Donald Trump to votes for Joe Biden?</p> <p>21 A. An elected official?</p> <p>22 Q. Uh-huh.</p> <p>23 A. No.</p> <p>24 Q. As of February 5th, 2021, had any government</p> <p>25 official told you that Smartmatic voting</p>	<p style="text-align: right;">Page 96</p> <p>1 Smartmatic at all, so how would I know that?</p> <p>2 I don't know.</p> <p>3 BY MR. FREY:</p> <p>4 Q. So as of February 5th, 2021, is it fair to</p> <p>5 say that no elected official or government</p> <p>6 official had told you that Smartmatic voting</p> <p>7 machines had inflated the number of votes --</p> <p>8 A. No, no one told me.</p> <p>9 MR. KACHOUROFF: Objection to</p> <p>10 form.</p> <p>11 You can answer. You can answer.</p> <p>12 THE WITNESS: No, I was not --</p> <p>13 didn't talk about that with anyone.</p> <p>14 BY MR. FREY:</p> <p>15 Q. And, similarly, as of February 5th, 2021, you</p> <p>16 had not seen any documents prepared by an</p> <p>17 elected official or government official</p> <p>18 indicating that Smartmatic voting machines</p> <p>19 had inflated the number of votes cast for</p> <p>20 Joe Biden, correct?</p> <p>21 A. Correct.</p> <p>22 Q. As of February 5th, 2021, you understood that</p> <p>23 Smartmatic software did not change votes cast</p> <p>24 for Donald Trump to votes for Joe Biden,</p> <p>25 correct?</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024

97-100

<p style="text-align: right;">Page 97</p> <p>1 A. Correct.</p> <p>2 Q. As of February 5th, 2021, you understood that</p> <p>3 Smartmatic software did not inflate the</p> <p>4 number of votes cast for Joe Biden, correct?</p> <p>5 MR. KACHOUROFF: Objection to</p> <p>6 form.</p> <p>7 THE WITNESS: Yeah, I wasn't aware</p> <p>8 of that, yeah.</p> <p>9 BY MR. FREY:</p> <p>10 Q. And, again, as of February 5th, 2021, no</p> <p>11 election official or government official had</p> <p>12 told you that Smartmatic software had</p> <p>13 inflated the number of votes cast for</p> <p>14 Joe Biden, correct?</p> <p>15 A. No. No.</p> <p>16 Q. Nor had you seen any document prepared by an</p> <p>17 elected official or government official</p> <p>18 indicating that Smartmatic software had</p> <p>19 inflated the number of votes cast for</p> <p>20 Joe Biden?</p> <p>21 A. I did not see any documents, no.</p> <p>22 Q. We've been talking about Smartmatic software.</p> <p>23 Similarly, as of February 5th, 2021,</p> <p>24 did you understand that voting machines</p> <p>25 generally did not change votes cast for</p>	<p style="text-align: right;">Page 99</p> <p>1 could change the outcome of the 2020</p> <p>2 election?</p> <p>3 A. I wasn't aware of that, no.</p> <p>4 Q. Prior to February 5th, 2021, were you aware</p> <p>5 that the country's cyber security and</p> <p>6 infrastructure security agency had issued a</p> <p>7 press release with a joint statement related</p> <p>8 to the security of the 2020 election?</p> <p>9 A. I was not aware of that statement, no.</p> <p>10 Q. Did you ever discuss either statement by</p> <p>11 former U.S. Attorney General Barr or the</p> <p>12 cyber security and infrastructure security</p> <p>13 agency with Mike Lindell?</p> <p>14 A. I don't believe so, no.</p> <p>15 Q. You're aware that Mike Lindell has accused</p> <p>16 Smartmatic, Dominion, and other voting</p> <p>17 machine companies of rigging the 2020</p> <p>18 presidential election, correct?</p> <p>19 A. I'm aware of that, yes.</p> <p>20 Q. And you're aware that this lawsuit is a</p> <p>21 result of those statements?</p> <p>22 A. I'm not totally into the details of what the</p> <p>23 lawsuit is exactly about, but...</p> <p>24 Q. You're aware of the lawsuit?</p> <p>25 A. Yeah, I'm aware there's a lawsuit.</p>
<p style="text-align: right;">Page 98</p> <p>1 Donald Trump to votes for Joe Biden?</p> <p>2 MR. KACHOUROFF: Objection to</p> <p>3 form.</p> <p>4 THE WITNESS: Yeah, I generally</p> <p>5 wasn't, again, aware of anything like this.</p> <p>6 So, no, I was not aware there was votes</p> <p>7 changed or anything.</p> <p>8 BY MR. FREY:</p> <p>9 Q. And, similarly, as of February 5th, 2021, no</p> <p>10 election official or government official had</p> <p>11 told you that voting machines had changed</p> <p>12 votes cast for Donald Trump to votes for</p> <p>13 Joe Biden?</p> <p>14 A. No, I didn't talk to any voting officials.</p> <p>15 Q. Okay. And, again, as of that date, you had</p> <p>16 not seen any documents prepared by government</p> <p>17 officials or elected officials indicating</p> <p>18 that voting machines had changed votes cast</p> <p>19 for Donald Trump to votes for Joe Biden?</p> <p>20 A. Nope, I saw no documents.</p> <p>21 Q. Prior to February 5th, 2021, were you aware</p> <p>22 that William Barr, the former U.S. Attorney</p> <p>23 General, had publicly stated that the</p> <p>24 U.S. Justice Department had uncovered no</p> <p>25 evidence of any widespread voter fraud that</p>	<p style="text-align: right;">Page 100</p> <p>1 Q. And the board has discussed the lawsuits,</p> <p>2 correct?</p> <p>3 A. We do discuss lawsuits. Specifically these</p> <p>4 ones, I -- not -- I don't recall exactly</p> <p>5 which lawsuits, but that is part of the board</p> <p>6 meeting, is discussing lawsuits.</p> <p>7 Q. Okay. I want to do -- I'll show you one</p> <p>8 document that might help refresh your</p> <p>9 recollection.</p> <p>10 MR. FREY: This will be marked as</p> <p>11 Exhibit 64 -- 664.</p> <p>12 Chris, it's Tab 10.</p> <p>13 (Exhibit 664 marked.)</p> <p>14 BY MR. FREY:</p> <p>15 Q. And this was produced with a Bates stamp</p> <p>16 DEF10333719 in the lower right-hand corner.</p> <p>17 Do you see that?</p> <p>18 A. I do.</p> <p>19 Q. And at the top it says, "MyPillow board</p> <p>20 meeting, 10/31/2022."</p> <p>21 Do you see that?</p> <p>22 A. Yep. Sorry.</p> <p>23 Q. And does this document look like the board</p> <p>24 minutes that are usually circulated following</p> <p>25 a board meeting?</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024
101-104

<p style="text-align: right;">Page 101</p> <p>1 A. It does, yes.</p> <p>2 Q. And if you go to the second page with the</p> <p>3 Bates stamp ending in 720, do you see, "Legal</p> <p>4 Matters," there in the middle of the page?</p> <p>5 A. I do.</p> <p>6 Q. And it says, "Dominion v. MP and Smartmatic</p> <p>7 v. MP." The first bullet is, "We are</p> <p>8 currently in discovery. Mike is now allowed</p> <p>9 to show his Dennis evidence."</p> <p>10 Do you see that?</p> <p>11 A. Yep.</p> <p>12 Q. At this point did the -- did the board review</p> <p>13 the, quote, "Dennis evidence"?</p> <p>14 A. I don't recall that, no.</p> <p>15 Q. Okay. Do you recall if the board discussed</p> <p>16 the, quote, "Dennis evidence"?</p> <p>17 A. I don't recall that, no.</p> <p>18 Q. Has Mike Lindell ever told you his opinion of</p> <p>19 how Dominion and Smartmatic went about</p> <p>20 rigging the 2020 election?</p> <p>21 A. How they went about it? Not in detail.</p> <p>22 Q. His theory on how Smartmatic and Dominion --</p> <p>23 A. Not in detail, if that's -- it's more of they</p> <p>24 did, I guess. He hasn't gone into detail</p> <p>25 with me, at least.</p>	<p style="text-align: right;">Page 103</p> <p>1 A. I'm not aware of that.</p> <p>2 Q. Are you aware of any evidence that voting</p> <p>3 machines flipped votes from President Trump</p> <p>4 to President Biden?</p> <p>5 A. I'm not aware of that.</p> <p>6 Q. Are you aware of any evidence that Smartmatic</p> <p>7 participated in the scheme to steal an</p> <p>8 election in Venezuela?</p> <p>9 A. I'm not aware of that.</p> <p>10 Q. Are you aware that -- of any evidence that</p> <p>11 Smartmatic operated anywhere outside of</p> <p>12 Los Angeles County during the 2020 --</p> <p>13 A. I'm not aware of that.</p> <p>14 Q. So we've talked about this a couple of times</p> <p>15 today, but I just want to confirm for the</p> <p>16 record, has the MyPillow board of directors</p> <p>17 ever discussed Mr. Lindell's public</p> <p>18 statements about election fraud?</p> <p>19 A. I don't recall any discussions.</p> <p>20 Q. Do you recall any instances in which the</p> <p>21 MyPillow board attempted to distance MyPillow</p> <p>22 from Mike Lindell's allegations of election</p> <p>23 fraud?</p> <p>24 A. I'm not aware of anything like that, no.</p> <p>25 Q. And have you been present at -- been present</p>
<p style="text-align: right;">Page 102</p> <p>1 Q. Okay. Do you have an understanding of his</p> <p>2 theory as to how Smartmatic and Dominion</p> <p>3 rigged the 2020 election?</p> <p>4 A. No.</p> <p>5 Q. Are you yourself aware of any evidence that</p> <p>6 Dominion rigged the 2020 election?</p> <p>7 MR. KACHOUROFF: Asked and</p> <p>8 answered, but go ahead.</p> <p>9 THE WITNESS: No, I'm not aware of</p> <p>10 any.</p> <p>11 BY MR. FREY:</p> <p>12 Q. Are you yourself aware of any evidence that</p> <p>13 Smartmatic rigged the 2020 election?</p> <p>14 A. No, I'm not aware of any.</p> <p>15 Q. Are you aware of any evidence that Smartmatic</p> <p>16 or its software had any relationship with</p> <p>17 Dominion?</p> <p>18 A. I'm not aware of that, no.</p> <p>19 Q. Are you aware of any evidence that Smartmatic</p> <p>20 or its software had any relationship with any</p> <p>21 other voting machine company?</p> <p>22 A. I'm not aware of that.</p> <p>23 Q. Are you aware of any evidence that a foreign</p> <p>24 country interfered with the election in</p> <p>25 November 2020?</p>	<p style="text-align: right;">Page 104</p> <p>1 or provided minutes with all of the board</p> <p>2 meetings from November 2020 through the</p> <p>3 present?</p> <p>4 A. I believe so.</p> <p>5 Q. And you don't recall any instances of</p> <p>6 discussions about Mike Lindell's allegations</p> <p>7 of election fraud at those meetings?</p> <p>8 A. I mean, it looks like we discussed the</p> <p>9 lawsuit. But as far as the allegations, no.</p> <p>10 Q. And how about as far as Mr. Mike Lindell</p> <p>11 promoting both MyPillow and his theories of</p> <p>12 election fraud in the same interviews or</p> <p>13 podcasts or --</p> <p>14 A. No, we didn't discuss that. No.</p> <p>15 Q. So after Mike Lindell became associated with</p> <p>16 President Trump in 2016, MyPillow began to</p> <p>17 increase its sales, correct?</p> <p>18 A. I'm not sure that's related, but -- I</p> <p>19 don't -- I don't know if you're saying we got</p> <p>20 busy because of Trump?</p> <p>21 Q. Well, Mike Lindell was able to reach more</p> <p>22 potential customers through appearances with</p> <p>23 President Trump, right?</p> <p>24 A. I'm not sure he had any besides like one</p> <p>25 appearance with Trump. I personally don't</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELLJune 18, 2024
105-108

<p style="text-align: right;">Page 105</p> <p>1 think that -- I mean, there might have been</p> <p>2 some spikes of things that happened, but,</p> <p>3 yeah, I don't know. I don't know if I would</p> <p>4 directly correlate any sort of Trump stuff to</p> <p>5 us having good sales days.</p> <p>6 Q. Okay. I want to look at one -- one document</p> <p>7 that might -- might help here. This is going</p> <p>8 to be marked --</p> <p>9 MR. FREY: Or this previously</p> <p>10 marked?</p> <p>11 MS. LOFTUS: No, it's not</p> <p>12 previously marked.</p> <p>13 MR. FREY: Okay. So this will be</p> <p>14 marked as Exhibit 665.</p> <p>15 Chris this is Tab 6-A, for your</p> <p>16 reference.</p> <p>17 (Exhibit 665 marked.)</p> <p>18 BY MR. FREY:</p> <p>19 Q. You see here there's a Bates identifier,</p> <p>20 DEF049098.00001 on the front right page?</p> <p>21 A. Yes.</p> <p>22 Q. And then at the top, do you see there's like</p> <p>23 four little boxes?</p> <p>24 A. Yep.</p> <p>25 Q. The first is, "Boss," with a phone number;</p>	<p style="text-align: right;">Page 107</p> <p>1 A. Because I didn't recognize who, "Boss," was.</p> <p>2 Is that one someone -- I don't know</p> <p>3 that number --</p> <p>4 Q. Okay.</p> <p>5 A. -- so I just wanted to make sure it wasn't</p> <p>6 that person.</p> <p>7 Q. Our understanding is that, "Device Owner,"</p> <p>8 would be Mike Lindell.</p> <p>9 A. Okay.</p> <p>10 MR. KACHOUROFF: Tim, I don't have</p> <p>11 this exhibit, I'm sorry. I've been looking</p> <p>12 through this. Maybe Julie can point me to</p> <p>13 it.</p> <p>14 MS. LOFTUS: Chris, it's 6-A. It</p> <p>15 would have been the second set.</p> <p>16 BY MR. FREY:</p> <p>17 Q. And while Chris is looking for that,</p> <p>18 Mr. Lindell, I'll tell you I'm going to be</p> <p>19 focused on page 122, if you want to</p> <p>20 familiarize yourself.</p> <p>21 A. Oh, perfect. Okay.</p> <p>22 MR. KACHOUROFF: Julie, I don't</p> <p>23 think I have it.</p> <p>24 MS. LOFTUS: Okay, I'll resend it.</p> <p>25 MR. FREY: Go off the record for a</p>
<p style="text-align: right;">Page 106</p> <p>1 then, "Darren Lindell," with a phone number;</p> <p>2 and then, "Mike Lindell," with a phone</p> <p>3 number.</p> <p>4 A. Okay.</p> <p>5 Q. Do you see that?</p> <p>6 A. Yep.</p> <p>7 Q. So I'll represent to you these are text</p> <p>8 messages that were produced to us. But if</p> <p>9 you could just confirm that those text --</p> <p>10 that's your phone number and Mike Lindell's</p> <p>11 phone number at the top.</p> <p>12 A. Yes, those are correct.</p> <p>13 Q. Okay. And so the first, I don't know, 20</p> <p>14 pages of this are redacted for purposes that</p> <p>15 aren't relevant to us today. And then you'll</p> <p>16 see it begins with text messages between</p> <p>17 yourself and Mike Lindell on January 2nd,</p> <p>18 2020.</p> <p>19 Do you see that at the very top of</p> <p>20 page 20?</p> <p>21 A. Yes. He's device owner, I guess?</p> <p>22 Q. Yeah, go ahead and take -- like, if you want</p> <p>23 to review a couple of them and --</p> <p>24 A. You're saying Mike is, "Device Owner"?</p> <p>25 Q. Yes.</p>	<p style="text-align: right;">Page 108</p> <p>1 second.</p> <p>2 THE VIDEOGRAPHER: We are going</p> <p>3 off the record. The time now is 11:25 a.m.</p> <p>4 (Recess.)</p> <p>5 THE VIDEOGRAPHER: We are going</p> <p>6 back on the record. The time now is</p> <p>7 11:35 a.m.</p> <p>8 BY MR. FREY:</p> <p>9 Q. Okay. Mr. Lindell, thank you for your</p> <p>10 patience as we work through the logistical</p> <p>11 issues.</p> <p>12 We were looking at these text</p> <p>13 messages that are between you and</p> <p>14 Mike Lindell, correct?</p> <p>15 A. Correct.</p> <p>16 Q. And if you go to the page 122, do you see</p> <p>17 there's a long text from you on August 17th,</p> <p>18 2020?</p> <p>19 A. Yes.</p> <p>20 Q. And I'm not going to get into this whole</p> <p>21 text, but I just want to look at the top of</p> <p>22 the second paragraph.</p> <p>23 You write, "Since COVID and your</p> <p>24 Rose Garden speech, we have been crazy busy</p> <p>25 and it's not letting up."</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024

109-112

<p style="text-align: right;">Page 109</p> <p>1 Do you see that?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. And so what was the Rose Garden speech</p> <p>4 you're referring to there?</p> <p>5 A. That was a speech Mike gave at the</p> <p>6 Rose Garden. I think it was regarding COVID</p> <p>7 or making masks or something. It was --</p> <p>8 business people I think were there.</p> <p>9 But, yeah, that's what I'm referring</p> <p>10 to there, is him giving a speech at the</p> <p>11 Rose Garden.</p> <p>12 Q. Okay. And is it fair to say that him giving</p> <p>13 a prominent speech at the Rose Garden like</p> <p>14 that did increase how busy MyPillow was?</p> <p>15 A. I would say it briefly increased our sales</p> <p>16 for a few days.</p> <p>17 Q. Okay. And did you see a pattern of that</p> <p>18 previously, you know, before this -- the</p> <p>19 Rose Garden speech where if Mike Lindell</p> <p>20 would make some kind of public appearance or</p> <p>21 political appearance, that you would have an</p> <p>22 increase in sales for a period of time?</p> <p>23 A. I think it would depend what type of</p> <p>24 appearance, but it can lead to some sales if</p> <p>25 he gets -- I mean, if there's a lot of people</p>	<p style="text-align: right;">Page 111</p> <p>1 your purposes, the one Julie just sent over.</p> <p>2 We'll mark this -- well, don't need to mark</p> <p>3 this. This was previously marked as</p> <p>4 Exhibit 641.</p> <p>5 BY MR. FREY:</p> <p>6 Q. And you see this has the Bates identifier</p> <p>7 DEF082645.00001 in the bottom right-hand</p> <p>8 corner?</p> <p>9 A. Yeah.</p> <p>10 Q. And, again, at the top of the first page it's</p> <p>11 got, "Darren Lindell," and, "Mike Lindell,"</p> <p>12 with phone numbers there?</p> <p>13 A. Yep.</p> <p>14 Q. And do you recognize that as your phone</p> <p>15 number and Mike Lindell's phone number?</p> <p>16 A. Yes.</p> <p>17 Q. And so then the first date on here is</p> <p>18 January 20th of 2021 at the top.</p> <p>19 Do you see that?</p> <p>20 A. Okay. Yes. Yes.</p> <p>21 Q. And then if you go to the second page, at the</p> <p>22 top -- the top text, which would have been</p> <p>23 on -- still on January 20th, 2021, you say,</p> <p>24 "Almost 10K orders today already."</p> <p>25 Do you see that?</p>
<p style="text-align: right;">Page 110</p> <p>1 watching him, they're going to, Oh, what's</p> <p>2 this about, and maybe check out our website</p> <p>3 or something.</p> <p>4 But that specific one was the biggest</p> <p>5 one we've experienced, as far as him making</p> <p>6 an appearance directly related to a big</p> <p>7 increase in sales.</p> <p>8 Q. Okay. And so would Mike Lindell's -- or did</p> <p>9 Mike Lindell's public appearances and</p> <p>10 appearances related to his election fraud</p> <p>11 campaign wherein he discussed the election</p> <p>12 being rigged and Smartmatic's role, did those</p> <p>13 appearances also boost MyPillow sales?</p> <p>14 A. The only two things I recall ever being big</p> <p>15 enough that they increased sales is</p> <p>16 Rose Garden, and then there was a time where</p> <p>17 he had a sheet that said, like, martial law</p> <p>18 or something like that, and some reporter</p> <p>19 caught it and it became a big news story.</p> <p>20 The only two, really, that I can</p> <p>21 think of. Nothing specifically about</p> <p>22 election fraud or anything like that.</p> <p>23 Q. Okay. Let's look at the next -- the next</p> <p>24 tab.</p> <p>25 MR. FREY: This is 6-B, Chris, for</p>	<p style="text-align: right;">Page 112</p> <p>1 A. Yep.</p> <p>2 Q. And then Mike responds, and you write back,</p> <p>3 "LOL, yeah, been a slow few days," smily</p> <p>4 face, "38,000 orders yesterday, shattered</p> <p>5 every record."</p> <p>6 Do you see that?</p> <p>7 A. Yep.</p> <p>8 Q. So were you referring to orders of MyPillow</p> <p>9 products?</p> <p>10 A. Yes.</p> <p>11 Q. And that was a record-breaking day for you,</p> <p>12 for MyPillow?</p> <p>13 A. 38,000, yeah, I believe so, yeah.</p> <p>14 Q. Okay. And then Mr. Lindell responds -- or</p> <p>15 Mr. Mike Lindell, I'm sorry, "4.6 million,</p> <p>16 who said being crazy in the news isn't good?"</p> <p>17 Do you see that?</p> <p>18 A. Yep.</p> <p>19 Q. Okay. And so that would be 38,000 orders,</p> <p>20 results in like \$4.6 million in revenue; is</p> <p>21 that a fair --</p> <p>22 A. That's what he's saying. So, I mean, I would</p> <p>23 assume. I didn't do the math on it.</p> <p>24 Q. That's what those two numbers would</p> <p>25 correlate, is orders and then --</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024

113-116

<p style="text-align: right;">Page 113</p> <p>1 A. I think that's what he's getting at, that's 2 what we did the day -- that same day. 3 Q. Okay. And then he references, "Who said 4 being crazy in the news isn't good?" 5 What do you understand that to be a 6 reference to? 7 A. I don't know what the -- what was the date on 8 this? Is this around Rose Garden or anything 9 like that or -- 10 Q. This is January 20th of 2021. 11 Okay. I'll represent to you that on 12 January 15th was the day that Mike Lindell 13 had gone to the White House to meet with 14 then-President Trump. 15 A. To meet with him. 16 For the Rose Garden speech or just to 17 meet with him? 18 Q. Just to meet with him about -- 19 A. Just -- 20 Q. -- about his theories of election fraud 21 and -- 22 A. Is this the martial law thing? Okay. I 23 mean, maybe he's referring to that then. I 24 don't know. 25 Q. But you would agree that the orders were a</p>	<p style="text-align: right;">Page 115</p> <p>1 for being in a box store. We lost all those, 2 so... 3 Q. And what do you -- what do you mean by that? 4 A. We don't sell to Bed Bath & Beyond, Walmart, 5 Kohl's. That also is why you see so many 6 direct-to-consumer orders, because those 7 customers order directly from us and not 8 buying them at Walmart or Bed Bath & Beyond 9 or Kohl's or all the retailers that we used 10 to sell to. 11 Q. Okay. Okay. But these direct -- these 12 direct-to-sales -- or direct-to -- 13 A. Consumer. 14 Q. -- consumer orders doing well continued 15 throughout 2021, correct? 16 A. Correct, yeah. 17 Q. Okay. If you flip with me to page 34. So 18 these are snippets here, so this is an 19 excerpt from a longer -- longer chain of 20 text, and we just broke it down to excerpts. 21 A. Gotcha. So 34. 22 Q. Thirty-four in the lower right-hand corner. 23 Do you see at the bottom right -- 24 right-hand corner, Mike Lindell, on June 3rd, 25 2021, sends you a link to, "Mike Lindell</p>
<p style="text-align: right;">Page 114</p> <p>1 record-breaking number of orders at this 2 point in time? 3 A. Yeah. I personally attribute a lot of it to 4 COVID, too. Orders are up crazy in general, 5 and then when he -- the martial law and the 6 Rose Garden speech, we definitely saw a spike 7 beyond what COVID had already created, which 8 was -- we were crazy busy for years -- two 9 years or whatever, but, yeah. 10 Q. And with respect to his reference to being 11 crazy in the news, had you and -- you and 12 Mike Lindell ever discussed the pros or cons 13 of being crazy in the news? 14 A. Not that I'm aware. And I would say I think 15 he's referring to people thinking he's crazy 16 in the news. I don't think he thinks he's 17 crazy. I think that probably leads to a lot 18 of articles about him, news going around, and 19 then it's more awareness, I guess, and -- 20 but, no, we've never discussed good or bad or 21 whatever. 22 Q. And -- but when there's more articles about 23 him, more going around, more awareness, that 24 could be good for sales? 25 A. It could be good on one hand, it could be bad</p>	<p style="text-align: right;">Page 116</p> <p>1 Presents Absolutely 9-0?" 2 A. Yeah. 3 Q. Do you understand that to be one of the 4 documentaries that -- 5 A. Yeah. He sends me links all the time. 6 Doesn't mean I click on them. 7 Q. And then he says, "I think you should have me 8 on as a guest on your podcast." 9 Do you yourself have a podcast? 10 A. It's a very small podcast I do with a friend 11 about the Vikings football team. 12 Q. Okay. And then on the next page he sends you 13 a couple of more links, correct? One is the 14 Mike Lindell Lawsuit, Dominion and 15 Smartmatic, 2020 election, and then on the 16 next day, Mike Lindell Presents 17 Absolutely 9-0? 18 A. So the same one? 19 Q. I think it's the same -- the same one he had 20 already sent you. 21 Do you see that? 22 A. Yes, I see that. 23 Q. Okay. And -- just a second. 24 All right. Then six days later on 25 June 27th, this is in the middle of the</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024

117-120

<p style="text-align: right;">Page 117</p> <p>1 page --</p> <p>2 A. Which page?</p> <p>3 Q. This is on page 36.</p> <p>4 A. Okay.</p> <p>5 Q. He types, "June 27th, 2021, we did 2 million</p> <p>6 today, biggest day since February 28th. The</p> <p>7 real president gave me a shout-out."</p> <p>8 A. Wait. I'm on the wrong page. Which page is</p> <p>9 it? Forty-six, okay.</p> <p>10 Q. Forty-six, I'm sorry.</p> <p>11 A. Forty-six. I don't see 46. I thought I just</p> <p>12 read what you said, though, somewhere, so...</p> <p>13 Q. The top of the page says, "June 19th,</p> <p>14 2021" --</p> <p>15 A. June 19th?</p> <p>16 Q. That's at the top of that.</p> <p>17 A. Got it. Yep. Yep, I'm on it.</p> <p>18 Q. And then down about midway through there's a</p> <p>19 date, June 27th.</p> <p>20 A. Yep.</p> <p>21 Q. It says, "We did 2 million today, biggest day</p> <p>22 since February 28th. The real president gave</p> <p>23 me a shout-out."</p> <p>24 Do you see that?</p> <p>25 A. Yep.</p>	<p style="text-align: right;">Page 119</p> <p>1 Q. Okay. The last thing I want to look at is a</p> <p>2 new document. This will be marked as</p> <p>3 Exhibit 666.</p> <p>4 MR. FREY: Chris, for your</p> <p>5 reference, it's Tab 9.</p> <p>6 (Exhibit 666 marked.)</p> <p>7 BY MR. FREY:</p> <p>8 Q. This has Bates identifier DEF11273862.</p> <p>9 Do you see that?</p> <p>10 A. Yep.</p> <p>11 Q. And, again, at the top it's, "MyPillow board</p> <p>12 meeting, 10/5/2021"?</p> <p>13 A. Yep.</p> <p>14 Q. Does this, again, appear to be board minutes</p> <p>15 that will be prepared after a MyPillow board</p> <p>16 meeting?</p> <p>17 A. It does.</p> <p>18 Q. Have you seen this document before?</p> <p>19 A. I don't recall if I saw it before.</p> <p>20 Q. You don't recall whether you've seen this?</p> <p>21 A. Yeah, I don't recall specifically seeing</p> <p>22 this, but I'm sure it was given out to me.</p> <p>23 Q. Okay. Do you have any reason to doubt that</p> <p>24 these are accurate --</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 118</p> <p>1 Q. And so, again, is he representing to you that</p> <p>2 they made \$2 million in sales on that day?</p> <p>3 A. Yeah, grossed 2 million.</p> <p>4 Q. And he's saying that that's the biggest day</p> <p>5 since February 28th, correct?</p> <p>6 A. Yep.</p> <p>7 Q. And February 28th would have been in around</p> <p>8 the time that the Absolute Proof series was</p> <p>9 released, right?</p> <p>10 A. Okay.</p> <p>11 Q. And here, this is a few days after he sent</p> <p>12 you a link to the Absolutely 9-0 documentary</p> <p>13 series, correct?</p> <p>14 A. Yeah, we saw that, yeah.</p> <p>15 Q. And he also references, "The real president</p> <p>16 gave me a shout-out"?</p> <p>17 A. Yep.</p> <p>18 Q. And do you know who Mike Lindell would be</p> <p>19 referring to as the real president?</p> <p>20 A. I believe he was referring to Donald Trump.</p> <p>21 Q. So this, again, is a reference to the</p> <p>22 connection with high sales and Donald Trump,</p> <p>23 right?</p> <p>24 A. Possibly. I mean, I'm not going to assume it</p> <p>25 couldn't be just two different things also.</p>	<p style="text-align: right;">Page 120</p> <p>1 Q. -- actual board minutes from a MyPillow board</p> <p>2 meeting on October 5th, 2021?</p> <p>3 A. No, this looks legit.</p> <p>4 Q. Okay. And it appears at the top here that</p> <p>5 you -- you called into the meeting, and it</p> <p>6 says, "(First 10 minutes.)"</p> <p>7 Do you see that?</p> <p>8 A. Okay. Yep.</p> <p>9 Q. Do you recall, would that have been you were</p> <p>10 on for the first 10 minutes and then off, or</p> <p>11 that you may have missed the first 10 minutes</p> <p>12 and then --</p> <p>13 A. I'm unsure which way that would go.</p> <p>14 Q. Okay.</p> <p>15 A. 10/5/2021. Nope, I'm not sure what they're</p> <p>16 referring to, if I'm on for the first 10 or</p> <p>17 if I missed the first 10.</p> <p>18 Q. Okay. Do you -- do you recall a meeting</p> <p>19 around that time being -- calling into a</p> <p>20 meeting around that time?</p> <p>21 A. I know I called into one, maybe two. So this</p> <p>22 would be one of them. The date is not</p> <p>23 ringing any bells, but I know I've called</p> <p>24 into a couple.</p> <p>25 Q. Okay. And then you mentioned just a few</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024
121-124

<p style="text-align: right;">Page 121</p> <p>1 minutes ago that, you know, being in the news</p> <p>2 or the election fraud campaign could possibly</p> <p>3 help with direct-to-consumer orders, but</p> <p>4 maybe hurt with big-box stores, right?</p> <p>5 A. Yes.</p> <p>6 Q. And if you look at the financial update at</p> <p>7 the bottom of the second page ending in 863.</p> <p>8 A. Yep.</p> <p>9 Q. Do you see it says, 2020, 355 million; six</p> <p>10 months later in 2020, 162 million; and then</p> <p>11 2021, 429 million?</p> <p>12 A. Yep.</p> <p>13 Q. And do you understand that be revenues on the</p> <p>14 year?</p> <p>15 A. I would assume so. I -- again, I think we</p> <p>16 deal in gross a lot of times, not net, but</p> <p>17 yeah.</p> <p>18 Q. Okay. And so 2021 revenues were higher than</p> <p>19 2020, right?</p> <p>20 A. Yep.</p> <p>21 Q. And then it says below that, "We are up</p> <p>22 50 percent currently and have made up the</p> <p>23 money lost from losing retailers."</p> <p>24 Do you see that?</p> <p>25 A. Yep.</p>	<p style="text-align: right;">Page 123</p> <p>1 fraud, right?</p> <p>2 A. Yeah, he -- I mean, I assume he was busy</p> <p>3 doing that type of stuff, sure.</p> <p>4 Q. And as we've seen earlier in those</p> <p>5 documentaries and at the cyber symposia and</p> <p>6 at rallies, there was also promotions for</p> <p>7 MyPillow products, right?</p> <p>8 A. Yes.</p> <p>9 Q. I want to look just up above that briefly at</p> <p>10 the chairman's report.</p> <p>11 And is the chairman Mike Lindell?</p> <p>12 A. Yeah, I believe so.</p> <p>13 Q. Okay. And one, two, three, four lines down</p> <p>14 it states, "Discussed FrankSpeech and how</p> <p>15 revenue will be coming from there as having</p> <p>16 them advertise MyPillow products."</p> <p>17 Do you see that?</p> <p>18 A. Yep.</p> <p>19 Q. And is that the FrankSpeech site that we</p> <p>20 discussed earlier today?</p> <p>21 A. I would assume, yes.</p> <p>22 Q. Okay. So at this board meeting, then, the</p> <p>23 MyPillow board was aware, as of at least</p> <p>24 October 2021, that MyPillow products would be</p> <p>25 being advertised on the FrankSpeech site,</p>
<p style="text-align: right;">Page 122</p> <p>1 Q. Is it accurate that by October 2021,</p> <p>2 MyPillow's revenues were up 50 percent?</p> <p>3 A. Based off this document. I don't -- I</p> <p>4 haven't seen the numbers myself besides right</p> <p>5 here. I think, again, COVID was a huge part</p> <p>6 of that.</p> <p>7 Q. Is it also true, then, by October 2021,</p> <p>8 MyPillow had made up the money lost from</p> <p>9 losing retailers?</p> <p>10 A. Maybe in 2021 we had made up the money, but</p> <p>11 we are still not getting those sales to</p> <p>12 today, if that makes sense. I don't think</p> <p>13 we're making up that money currently. I</p> <p>14 think we could definitely use some big-box</p> <p>15 stores.</p> <p>16 2021 was a -- was COVID. I mean, we</p> <p>17 were crushing it, so I don't know.</p> <p>18 Yeah, we made more in direct sales</p> <p>19 during COVID. I mean, nobody was going to go</p> <p>20 to the retail stores anyways. So, yeah, I</p> <p>21 don't --</p> <p>22 Q. And 2021 was also the time when Mike Lindell</p> <p>23 was very active in publishing documentaries</p> <p>24 and attending rallies and hosting cyber</p> <p>25 symposia relating to claims of election</p>	<p style="text-align: right;">Page 124</p> <p>1 correct?</p> <p>2 A. Yep, as like an affiliate, like Pete Santilli</p> <p>3 and all the other affiliates.</p> <p>4 Q. And the MyPillow board was also aware that</p> <p>5 MyPillow would be earning revenue from the</p> <p>6 advertisements made on FrankSpeech?</p> <p>7 A. I assume so, yeah.</p> <p>8 Q. And with -- do you recall, was there an</p> <p>9 actual vote on whether to approve this</p> <p>10 relationship -- revenue-sharing relationship</p> <p>11 with FrankSpeech?</p> <p>12 A. I don't recall a vote, no. But I -- again, I</p> <p>13 might not have been on this one, I guess, but</p> <p>14 we don't know. I don't recall it.</p> <p>15 Q. There's no -- there's no indication, at least</p> <p>16 in the minutes, that a vote was held, right?</p> <p>17 A. Yeah, I don't see anything.</p> <p>18 Q. And would the board typically vote on</p> <p>19 revenue-sharing agreements?</p> <p>20 A. No.</p> <p>21 Q. But this revenue-sharing agreement with</p> <p>22 FrankSpeech was -- was made at the time that</p> <p>23 revenues were up 50 percent, correct?</p> <p>24 A. At MyPillow?</p> <p>25 Q. Yes.</p>

DARREN M. LINDELL
SMARTMATIC USA vs MICHAEL J. LINDELL

June 18, 2024
125-127

<p style="text-align: right;">Page 125</p> <p>1 A. Yeah. According to this document, yeah, 2 revenues were up 50 percent. 3 Q. And if it's -- if something is being shared 4 with the board, it's probably accurate 5 information, I would assume? 6 A. Yeah, I would assume that, yeah. 7 Q. Okay. 8 A. I just worry it's generalized. Fifty percent 9 seems like a very round number to me. 10 Q. So it could have been 49, 52, something like 11 that? 12 A. Yeah. 13 MR. FREY: Okay. Let's take a 14 quick break. I just want to look through my 15 notes, and then we should be close to done. 16 THE WITNESS: Okay. 17 THE VIDEOGRAPHER: We are going 18 off the record. The time now is 11:55 a.m. 19 (Recess.) 20 THE VIDEOGRAPHER: We are going 21 back on the record. The time now is 22 12:03 p.m. 23 MR. FREY: Okay, Mr. Lindell, 24 thank you your time today. We have no 25 further questions for you at this time.</p>	<p style="text-align: right;">Page 127</p> <p>1 REPORTER'S CERTIFICATE 2 Be it known that I took the foregoing 3 videotaped deposition of Darren M. Lindell, 4 on June 18, 2024; 5 That I was then and there a Registered 6 Professional Reporter and a Notary Public, 7 and that by virtue thereof, I was duly authorized 8 to administer an oath; 9 That the witness was by me first duly 10 sworn to testify to the truth, the whole truth and 11 nothing but the truth relative to said cause; 12 That the foregoing transcript is a true 13 and correct transcript of my stenographic notes in 14 said matter; 15 That I am not related to any of the 16 parties hereto, nor interested in the outcome of 17 the action; 18 WITNESS MY HAND AND SEAL the 19th day of June, 19 2024. 20 _____ 21 Amy L. Larson, RPR 22 My Commission Expires 01/31/25 23 24 25</p>
<p style="text-align: right;">Page 126</p> <p>1 THE WITNESS: Perfect. Thank you. 2 THE VIDEOGRAPHER: We are going 3 off -- 4 MR. KACHOUROFF: That's it. 5 THE VIDEOGRAPHER: We are going 6 off the record. The time now is 12:03 p.m., 7 and this concludes today's testimony given by 8 Darren M. Lindell. 9 (Deposition concluded 12:03 p.m.) 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	